EXHIBIT 66 FILED UNDER SEAL

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 2 of 48 ATTORNEYS EYES ONLY

1	
1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
3	SAN FRANCISCO DIVISION
4	00
5	
6	WAYMO LLC,
7	Plaintiff,
8	vs. No. 3:17-cv-00939-WHA
9	UBER TECHNOLOGIES, INC.;
	OTTOMOTTO LLC; OTTO TRUCKING,
10	INC.,
11	Defendants.
	/
12	
13	
14	ATTORNEYS' EYES ONLY
15	
16	VIDEOTAPED DEPOSITION OF ANTHONY LEVANDOWSKI
17	SAN FRANCISCO, CALIFORNIA
18	FRIDAY, APRIL 14, 2017
19	
20	
21	
22	BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~
23	CSR LICENSE NO. 9830
24	JOB NO. 2594023
25	Pages 1 - 184
	Page 1

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 3 of 48 ATTORNEYS EYES ONLY

SEIES ONLI
1 APPEARANCES: (Cont.) 2
24
25
Page 4
1 INDEX 2
3 WITNESS: Anthony Levandowski
4
5 EXAMINATION PAGE
6 Mr. Perlson 8, 179
7 Ms. Ray 165
8
9 10
11 EXHIBITS
12 EXHIBIT PAGE
13 Exhibit 25 Schematic for Uber's Fuji board 135
14 Exhibit 26 PCB Configuration for the Fuji 142
15 board
16
17oOo
18
19
20 21
21 22
23
24
25
Page 5

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 4 of 48 ATTORNEYS EYES ONLY

1 SAN FRANCISCO, CALIFORNIA	1 ANTHONY LEVANDOWSKI, 09:06
· · · · · · · · · · · · · · · · · · ·	, ·
2 FRIDAY, APRIL 14, 2017 3 9:05 A.M.	having been sworn as a witnessby the Certified Shorthand Reporter,
	-
4	4 testified as follows:
5	5
6	6 EXAMINATION
7 THE VIDEOGRAPHER: Good morning. 09:03	7 BY MR. PERLSON:
8 THE WITNESS: Good morning. 09:05	8 Q Can you please state and spell your name for 09:07
9 MR. EHRLICH: Good morning. 09:05	9 the record. 09:07
THE VIDEOGRAPHER: We are on the record at 09:05	10 A Anthony Levandowski. A-N-T-H-O-N-Y, 09:07
11 9:05 a.m. on April 14th, 2017. 09:05	11 L-E-V-A-N-D-O-W-S-K-I. 09:07
This is the video recorded deposition of 09:06	12 Q And where do you live? 09:07
13 Anthony Levandowski. 09:06	13 A I live in Oakland, California. 09:07
My name is Jeffrey Anderson, here with our 09:06	14 Q And have you ever been deposed before? 09:07
5 court reporter, Andrea Ignacio. We're here from 09:06	15 A I have not. 09:08
6 Veritext Legal Solutions at the request of counsel for 09:06	16 Q Well, you understand that you're testifying 09:08
7 the defendant. 09:06	17 under oath, the same oath that you would take if you 09:08
8 This deposition is being held at 09:06	18 were testifying in front of a jury? 09:08
9 50 California Street in San Francisco, California. 09:06	19 A I understand that. 09:08
The caption of this case is Waymo, LLC versus 09:06	20 Q Is there any reason you can't give complete 09:08
21 Uber Technologies. Case No. 317-CV-00939 WHA. 09:06	21 and accurate testimony today? 09:08
Please note that audio and video recording 09:06	22 A I don't see why not. 09:08
3 will take place, unless all parties agree to go off 09:06	23 Q I'm going to try to be as clear as I can. 09:08
24 the record. Microphones are sensitive and may pick up 09:06	24 But, if I'm not clear, please do let me know, and I'll 09:08
25 whispers, private conversations, and cellular 09:06	25 do my best to rephrase the question. 09:08
Page 6	Page
1 interference, so please be aware of that. 09:06	1 Is that acceptable? 09:08
Please state your name and the firm you 09:06	2 A That sounds great. 09:08
3 represent, beginning with the noticing attorney. 09:06	3 Q And, you need to give audible answers, yes or 09:08
4 MR. PERLSON: I just want to correct one 09:06	4 no, rather than nodding of the head or shaking of the 09:08
5 thing you said. Plaintiff Waymo requested the 09:06	5 head. 09:08
6 deposition, not the defendant. 09:07	6 A Of course. I understand that. 09:08
7 THE VIDEOGRAPHER: I apologize about that. 09:07	7 Q I see you have a couple of pieces of paper in 09:08
8 MR. PERLSON: David Perlson from Quinn 09:07	8 front of you. Can you tell me what those are. 09:08
9 Emanuel, on behalf of plaintiff Waymo. 09:07	9 A Yeah, my counsel gave me two pieces of paper. 09:08
MR. SCHMIDT: Patrick Schmidt from Quinn 09:07	10 They say very similar things. Do you want me to read 09:08
1 Emanuel, on behalf of plaintiff Waymo. 09:07	11 them out to you? 09:08
2 MS. STANTON: Shana Stanton from Waymo. 09:07	12 Q No. I suspect that you'll probably read them 09:08
MS. BARTOW: Nicole Bartow, in-house at Uber. 09:07	13 later. 09:08
MS. RAY: Wendy Ray of Morrison & Foerster, 09:07	14 A You'll hear them, most likely. 09:09
15 on behalf of defendants Uber Technologies, Ottomoto, 09:07	15 Q Yeah. Okay. 09:09
16 and Otto Trucking. 09:07	Well, where do you work currently? 09:09
IT ASSESSED TO A CONTROL OF THE CONT	17 A I work at Uber. 09:09
MR. EHRLICH: Miles Ehrlich from Ramsey & 09:07	l
ř	18 Q Okay. And what's your position there? 09:09
18 Ehrlich, on behalf of the deponent, Anthony 09:07	18 Q Okay. And what's your position there? 09:09 19 A I'm vice president of engineering. 09:09
18 Ehrlich, on behalf of the deponent, Anthony 09:07 19 Levandowski. 09:07	
18 Ehrlich, on behalf of the deponent, Anthony 09:07 19 Levandowski. 09:07 20 THE VIDEOGRAPHER: Thank you. 09:07	19 A I'm vice president of engineering. 09:09 20 Q And in what aspect of what what what 09:09
18 Ehrlich, on behalf of the deponent, Anthony 09:07 19 Levandowski. 09:07 20 THE VIDEOGRAPHER: Thank you. 09:07 21 The witness will be sworn in, and counsel may 09:07	19 A I'm vice president of engineering. 09:09 20 Q And in what aspect of what what what 09:09 21 are your responsibilities as vice president of 09:09
18 Ehrlich, on behalf of the deponent, Anthony 09:07 19 Levandowski. 09:07 20 THE VIDEOGRAPHER: Thank you. 09:07 21 The witness will be sworn in, and counsel may 09:07 22 begin the examination. 09:07	19 A I'm vice president of engineering. 09:09 20 Q And in what aspect of what what what 09:09 21 are your responsibilities as vice president of 09:09 22 engineering? 09:09
18 Ehrlich, on behalf of the deponent, Anthony 09:07 19 Levandowski. 09:07 20 THE VIDEOGRAPHER: Thank you. 09:07 21 The witness will be sworn in, and counsel may 09:07 22 begin the examination. 09:07 23 /// 09:07	19 A I'm vice president of engineering. 09:09 20 Q And in what aspect of what what what 09:09 21 are your responsibilities as vice president of 09:09 22 engineering? 09:09 23 MR. EHRLICH: I'm going to instruct you to 09:09
18 Ehrlich, on behalf of the deponent, Anthony 09:07 19 Levandowski. 09:07 20 THE VIDEOGRAPHER: Thank you. 09:07 21 The witness will be sworn in, and counsel may 09:07 22 begin the examination. 09:07	19 A I'm vice president of engineering. 09:09 20 Q And in what aspect of what what what 09:09 21 are your responsibilities as vice president of 09:09 22 engineering? 09:09

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 5 of 48 ATTORNEYS EYES ONLY

1 "On the advice and direction of my counsel, I 09:09	1 A On the advice and direction of my counsel, I 09:11
2 respectfully decline to answer. And I assert the 09:09	2 respectfully decline to answer. And I assert the 09:12
3 rights guaranteed to me under the Fifth Amendment of 09:09	3 rights guaranteed to me under the Fifth Amendment of 09:12
4 the Constitution of the United States." 09:09	4 the Constitution of the United States. 09:12
5 MR. PERLSON: Q. How long have you worked at 09:09	5 Q You and Uber discussed that your new company 09:12
6 Uber? 09:09	6 would eventually be acquired by Uber while you were 09:12
7 A On the advice and direction of my counsel, I 09:09	7 still employed at Google? 09:12
8 respectfully decline to answer. And I assert the 09:09	8 A On the advice and direction of my counsel, I 09:12
9 rights guaranteed to me under the Fifth Amendment of 09:09	9 respectfully decline to answer. And I assert the 09:12
10 the Constitution of the United States. 09:09	10 rights guaranteed to me under the Fifth Amendment of 09:12
11 Q You are a former employee of Google; correct? 09:10	11 the Constitution of the United States. 09:12
12 A That's correct. 09:10	12 Q You began forming your new company that would 09:12
13 Q When did you leave the employ of Google? 09:10	13 eventually be acquired by Uber in early 2016; is that 09:12
14 MR. EHRLICH: You can answer. 09:10	14 correct? 09:12
15 THE WITNESS: Okay. In January of 2016. I 09:10	15 A On the advice and direction of my counsel, I 09:12
16 don't know the exact date, yeah. 09:10	16 respectfully decline to answer. And I assert the 09:12
MR. PERLSON: Q. When you worked at Google, 09:10	17 rights guaranteed to me under the Fifth Amendment of 09:12
18 you received tens of millions of dollars in 09:10	18 the Constitution of the United States. 09:12
19 compensation from Google; is that accurate? 09:10	19 Q That new company eventually became Otto; 09:12
20 MR. EHRLICH: I'm going to instruct you to 09:10	20 correct? 09:12
21 assert your rights. 09:10	21 A On the advice and direction of my counsel, I 09:12
22 THE WITNESS: Okay. On the advice and 09:10	22 respectfully decline to answer. And I assert the 09:12
23 direction of my counsel, I respectfully decline to 09:10	23 rights guaranteed to me under the Fifth Amendment of 09:12
24 answer. And I assert the rights guaranteed to me 09:10	24 the Constitution of the United States. 09:12
25 under the Fifth Amendment of the Constitution of the 09:10 Page 10	25 Q While you were still employed by Google, you 09:12 Page 12
T. Control of the Con	l i
1 United States. 09:10	1 recruited engineers to join your new company so that 09:12
2 MR. PERLSON: Q. You understood that, while 09:10	2 your new company could replicate Google's LiDar 09:13
2 MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13
2 MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10	 2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13
2 MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13
2 MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13
2 MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13
2 MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13
2 MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11 12 confidential information for a competitor? 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11 12 confidential information for a competitor? 09:11 13 A On the advice and direction of my counsel, I 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11 Google, you were not allowed to use Google's 09:11 Confidential information for a competitor? 09:11 A On the advice and direction of my counsel, I 09:11 respectfully decline to answer. And I assert the 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11 Google, you were not allowed to use Google's 09:11 Confidential information for a competitor? 09:11 A On the advice and direction of my counsel, I 09:11 A On the advice and direction of my counsel, I 09:11 rights guaranteed to me under the Fifth Amendment of 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11 12 confidential information for a competitor? 09:11 13 A On the advice and direction of my counsel, I 09:11 14 respectfully decline to answer. And I assert the 09:11 15 rights guaranteed to me under the Fifth Amendment of 09:11 16 the Constitution of the United States. 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11 12 confidential information for a competitor? 09:11 13 A On the advice and direction of my counsel, I 09:11 14 respectfully decline to answer. And I assert the 09:11 15 rights guaranteed to me under the Fifth Amendment of 09:11 16 the Constitution of the United States. 09:11 17 Q Mr. Levandowski, you were in discussions with 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11 Google, you were not allowed to use Google's 09:11 confidential information for a competitor? 09:11 A On the advice and direction of my counsel, I 09:11 respectfully decline to answer. And I assert the 09:11 rights guaranteed to me under the Fifth Amendment of 09:11 the Constitution of the United States. 09:11 Mr. Levandowski, you were in discussions with 09:11 Uber for months prior to your departure from Google 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11 Google, you were not allowed to use Google's 09:11 confidential information for a competitor? 09:11 A On the advice and direction of my counsel, I 09:11 respectfully decline to answer. And I assert the 09:11 rights guaranteed to me under the Fifth Amendment of 09:11 the Constitution of the United States. 09:11 Mr. Levandowski, you were in discussions with 09:11 When I was a competitor of the United States of the Constitution of	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13 19 rights guaranteed to me on the Fifth Amendment 09:13
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11 Google, you were not allowed to use Google's 09:11 confidential information for a competitor? 09:11 A On the advice and direction of my counsel, I 09:11 respectfully decline to answer. And I assert the 09:11 rights guaranteed to me under the Fifth Amendment of 09:11 the Constitution of the United States. 09:11 Wh. Levandowski, you were in discussions with 09:11 Where for months prior to your departure from Google 09:11 regarding working for Uber; correct? 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13 19 rights guaranteed to me on the Fifth Amendment 09:13 20 under the Fifth Amendment of the United States the 09:13
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11 12 confidential information for a competitor? 09:11 13 A On the advice and direction of my counsel, I 09:11 14 respectfully decline to answer. And I assert the 09:11 15 rights guaranteed to me under the Fifth Amendment of 09:11 16 the Constitution of the United States. 09:11 17 Q Mr. Levandowski, you were in discussions with 09:11 18 Uber for months prior to your departure from Google 09:11 19 regarding working for Uber; correct? 09:11 20 A On the advice of my counsel, I respectfully 09:11 21 decline to answer. And I assert the rights guaranteed 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13 19 rights guaranteed to me on the Fifth Amendment 09:13 20 under the Fifth Amendment of the United States the 09:13
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11 12 confidential information for a competitor? 09:11 13 A On the advice and direction of my counsel, I 09:11 14 respectfully decline to answer. And I assert the 09:11 15 rights guaranteed to me under the Fifth Amendment of 09:11 16 the Constitution of the United States. 09:11 17 Q Mr. Levandowski, you were in discussions with 09:11 18 Uber for months prior to your departure from Google 09:11 19 regarding working for Uber; correct? 09:11 20 A On the advice of my counsel, I respectfully 09:11 21 decline to answer. And I assert the rights guaranteed 09:11 22 to me under the Fifth Amendment of the Constitution of 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13 19 rights guaranteed to me on the Fifth Amendment 09:13 20 under the Fifth Amendment of the United States the 09:13 21 Fifth Amendment of the Constitution of the United O9:14 22 States. 09:14
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11 Google, you were not allowed to use Google's 09:11 confidential information for a competitor? 09:11 A On the advice and direction of my counsel, I 09:11 respectfully decline to answer. And I assert the 09:11 rights guaranteed to me under the Fifth Amendment of 09:11 the Constitution of the United States. 09:11 Q Mr. Levandowski, you were in discussions with 09:11 Uber for months prior to your departure from Google 09:11 Regarding working for Uber; correct? 09:11 A On the advice of my counsel, I respectfully 09:11 decline to answer. And I assert the rights guaranteed 09:11 decline to answer. And I assert the rights guaranteed 09:11 to me under the Fifth Amendment of the Constitution of 09:11 to me under the Fifth Amendment of the Constitution of 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13 19 rights guaranteed to me on the Fifth Amendment 09:13 20 under the Fifth Amendment of the United States the 09:13 21 Fifth Amendment of the Constitution of the United 09:14 22 States. 09:14 23 Q Mr. Kalanick was aware of your plan to 09:14
MR. PERLSON: Q. You understood that, while 09:10 3 you were at Google, that you were obligated to keep 09:10 4 Google sensitive information confidential? 09:10 5 A On the advice of on the on the advice 09:10 6 and direction of my counsel, I respectfully decline to 09:11 7 answer. And I assert the rights guaranteed to me 09:11 8 under the Fifth Amendment of the Constitution of the 09:11 9 United States. 09:11 10 Q You understand that, while you were at 09:11 11 Google, you were not allowed to use Google's 09:11 12 confidential information for a competitor? 09:11 13 A On the advice and direction of my counsel, I 09:11 14 respectfully decline to answer. And I assert the 09:11 15 rights guaranteed to me under the Fifth Amendment of 09:11 16 the Constitution of the United States. 09:11 17 Q Mr. Levandowski, you were in discussions with 09:11 18 Uber for months prior to your departure from Google 09:11 19 regarding working for Uber; correct? 09:11 20 A On the advice of my counsel, I respectfully 09:11 21 decline to answer. And I assert the rights guaranteed 09:11 22 to me under the Fifth Amendment of the Constitution of 09:11 23 the United States. 09:11 24 Q You and Uber discussed how you would form a 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13 19 rights guaranteed to me on the Fifth Amendment 09:13 20 under the Fifth Amendment of the United States the 09:13 21 Fifth Amendment of the Constitution of the United O9:14 22 States. 09:14 23 Q Mr. Kalanick was aware of your plan to 09:14 24 replicate Google's LiDar technology for your new 09:14
MR. PERLSON: Q. You understood that, while 09:10 you were at Google, that you were obligated to keep 09:10 Google sensitive information confidential? 09:10 A On the advice of on the on the advice 09:10 and direction of my counsel, I respectfully decline to 09:11 answer. And I assert the rights guaranteed to me 09:11 under the Fifth Amendment of the Constitution of the 09:11 United States. 09:11 Q You understand that, while you were at 09:11 Google, you were not allowed to use Google's 09:11 confidential information for a competitor? 09:11 A On the advice and direction of my counsel, I 09:11 respectfully decline to answer. And I assert the 09:11 rights guaranteed to me under the Fifth Amendment of 09:11 the Constitution of the United States. 09:11 Q Mr. Levandowski, you were in discussions with 09:11 Uber for months prior to your departure from Google 09:11 Regarding working for Uber; correct? 09:11 A On the advice of my counsel, I respectfully 09:11 decline to answer. And I assert the rights guaranteed 09:11 decline to answer. And I assert the rights guaranteed 09:11 to me under the Fifth Amendment of the Constitution of 09:11 to me under the Fifth Amendment of the Constitution of 09:11	2 your new company could replicate Google's LiDar 09:13 3 technology; correct? 09:13 4 A On the advice and direction of my counsel, I 09:13 5 respectfully decline to answer. And I assert the 09:13 6 rights guaranteed to me under the Fifth Amendment of 09:13 7 the Constitution of the United States. 09:13 8 Q You made Uber aware of your plan to replicate 09:13 9 Google's LiDar technology for your new company; 09:13 10 correct? 09:13 11 A On the on the advice and direction of my 09:13 12 counsel, I respectfully decline to answer. And I 09:13 13 assert the rights guaranteed to me under the Fifth 09:13 14 Amendment of the Constitution of the United States. 09:13 15 Q Travis Kalanick recruited you personally to 09:13 16 do to work for Uber; correct? 09:13 17 A On the advice and direction of my counsel, I 09:13 18 respectfully decline to answer. And I assert the 09:13 19 rights guaranteed to me on the Fifth Amendment 09:13 20 under the Fifth Amendment of the United States the 09:13 21 Fifth Amendment of the Constitution of the United 09:14 22 States. 09:14 23 Q Mr. Kalanick was aware of your plan to 09:14

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 6 of 48 ATTORNEYS EYES ONLY

1 A On the advice and direction of my counsel, I 09:14	1 the Constitution of the United States. 09:16
2 respectfully decline to answer. And I assert the 09:14	2 Q Uber knew that you took 14,000 confidential 09:16
3 rights guaranteed to me under the Fifth Amendment of 09:14	3 documents from Google in order to accelerate your 09:16
4 the Constitution of the United States. 09:14	4 development of LiDar technology at Otto 09:16
5 Q In fact, Uber Uber encouraged you to 09:14	5 A On 09:16
6 replicate Google's LiDar technology at Otto; correct? 09:14	6 Q correct? 09:16
7 A On the advice and direction of my counsel, I 09:14	7 A On the advice and direction of my counsel, I 09:16
8 respectfully decline to answer. And I assert the 09:14	8 respectfully decline to answer. And I assert the 09:16
9 rights guaranteed to me under the Fifth Amendment of 09:14	9 rights guaranteed to me under the Fifth Amendment of 09:16
10 the Constitution of the United States. 09:14	10 the Constitution of the United States. 09:16
11 Q And Mr. Kalanick encouraged you to replicate 09:14	11 Q Uber encouraged you to take the 09:16
12 Google's LiDar technology at Otto; correct? 09:14	12 14,000 confidential Google documents so that the 09:16
13 A On the advice and direction of my counsel, I 09:14	13 information would be available to Uber when it 09:16
14 respectfully decline to answer. And I assert the 09:14	14 acquired Otto; correct? 09:16
15 rights guaranteed to me under the Fifth Amendment of 09:14	15 A On the on the advice and direction of my 09:16
16 the Constitution of the United States. 09:14	16 counsel, I respectfully decline to answer. And I 09:17
17 Q Uber encouraged you to replicate Google's 09:14	17 assert the rights guaranteed to me under the Fifth 09:17
	17 assert the rights guaranteed to me under the Fifth 09:17 18 Amendment of the Constitution of the United States. 09:17
18 LiDar technology so that it would be available to Uber 09:15	
19 when it acquired Otto; correct? 09:15	19 Q Uber helped you conceal the fact that you had 09:17
20 A On the advice and direction of my counsel, I 09:15	20 taken 14,000 confidential documents from Google; 09:17
21 respectfully decline to answer. And I assert the 09:15	21 correct? 09:17
22 rights guaranteed to me under the Fifth Amendment of 09:15	22 A On the advice and direction of my counsel, I 09:17
23 the Constitution of the United States. 09:15	23 respectfully decline to answer. And I assert the 09:17
24 Q You took over 14,000 confidential documents 09:15	24 rights guaranteed to me under the Fifth Amendment of 09:17
25 from Google prior to your departure from Google; 09:15 Page 14	25 the Constitution of the United States. 09:17 Page 16
T ugo 11	
1 correct? 09:15	1 Q Uber developed a plan in which a joint 09:17
	1 Q Uber developed a plan in which a joint 09:17 2 defense agreement would be entered for the sole 09:17
1 correct? 09:15	
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15	2 defense agreement would be entered for the sole 09:17
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16 19 the Constitution of the United States. 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18 19 and the client in that instruction. 09:18
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16 19 the Constitution of the United States. 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18 19 and the client in that instruction. 09:19
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16 19 the Constitution of the United States. 09:16 20 Q You took the 14,000 documents from Google so 09:16 21 that you could get so that you could more quickly 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18 19 and the client in that instruction. 09:19 20 MR. EHRLICH: The attorney and the client in 09:19 21 that instruction? 09:19
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16 19 the Constitution of the United States. 09:16 20 Q You took the 14,000 documents from Google so 09:16 21 that you could get so that you could more quickly 09:16 22 replicate Google's technology at Otto; correct? 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18 19 and the client in that instruction. 09:18 20 MR. EHRLICH: The attorney and the client in 09:19 21 that instruction? 09:19 22 The client is Mr. Levandowski, and the 09:19
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:16 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16 19 the Constitution of the United States. 09:16 20 Q You took the 14,000 documents from Google so 09:16 21 that you could get so that you could more quickly 09:16 22 replicate Google's technology at Otto; correct? 09:16 23 A On the advice and direction of my counsel, I 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18 19 and the client in that instruction. 09:18 20 MR. EHRLICH: The attorney and the client in 09:19 21 that instruction? 09:19 22 The client is Mr. Levandowski, and the 09:19 23 attorney at the time was John Gardner, and other 09:19
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:15 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16 19 the Constitution of the United States. 09:16 20 Q You took the 14,000 documents from Google so 09:16 21 that you could get so that you could more quickly 09:16 22 replicate Google's technology at Otto; correct? 09:16 23 A On the advice and direction of my counsel, I 09:16 24 respectfully decline to answer. And I assert the 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18 19 and the client in that instruction. 09:18 20 MR. EHRLICH: The attorney and the client in 09:19 21 that instruction? 09:19 22 The client is Mr. Levandowski, and the 09:19 23 attorney at the time was John Gardner, and other 09:19 24 attorneys associated with Uber and Otto, whose names I 09:19
1 correct? 09:15 2 A On the advice and direction of my counsel, I 09:15 3 respectfully decline to answer. And I assert the 09:15 4 rights guaranteed to me under the Fifth Amendment of 09:15 5 the Constitution of the United States. 09:15 6 Q You made these 14,000 confidential documents, 09:15 7 that you took from Google, available to your new 09:15 8 company, Otto; correct? 09:15 9 A On the advice and direction of my counsel, I 09:15 10 respectfully decline to answer. And I assert the 09:15 11 rights guaranteed to me under the Fifth Amendment of 09:15 12 the Constitution of the United States. 09:15 13 Q Among the 14,000 documents you took from 09:15 14 Google, there were documents that reflected Google's 09:15 15 proprietary LiDar technology; correct? 09:16 16 A On the advice and direction of my counsel, I 09:16 17 respectfully decline to answer. And I assert the 09:16 18 rights guaranteed to me under the Fifth Amendment of 09:16 19 the Constitution of the United States. 09:16 20 Q You took the 14,000 documents from Google so 09:16 21 that you could get so that you could more quickly 09:16 22 replicate Google's technology at Otto; correct? 09:16 23 A On the advice and direction of my counsel, I 09:16	2 defense agreement would be entered for the sole 09:17 3 purpose of hiding the fact that you had taken 09:17 4 14,000 confidential documents from Google? 09:17 5 MS. RAY: I instruct you not to answer on the 09:17 6 basis of attorney-client privilege. 09:17 7 MR. PERLSON: Q. Are you aware of the 09:18 8 existence of a due diligence report regarding that 09:18 9 regarding Uber's acquisition of Otto? 09:18 10 MS. RAY: Can you hold on a second. 09:18 11 You may answer. 09:18 12 MR. EHRLICH: I'm going to instruct you to 09:18 13 decline to answer based on attorney-client privilege, 09:18 14 and also instruct you to assert your rights. 09:18 15 THE WITNESS: Okay. On the 09:18 16 MS. RAY: Join in that instruction on 09:18 17 attorney-client privilege. 09:18 18 MR. PERLSON: Can you identify the attorney 09:18 19 and the client in that instruction. 09:18 20 MR. EHRLICH: The attorney and the client in 09:19 21 that instruction? 09:19 22 The client is Mr. Levandowski, and the 09:19 23 attorney at the time was John Gardner, and other 09:19

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 7 of 48 ATTORNEYS EYES ONLY

I and the second	
1 And it's related to joint defense common 09:19	1 the Constitution of the United States. 09:21
2 interest privilege that's been under discussion before 09:19	2 Q Throughout the first half of 2016 you did, in 09:21
3 Judge Alsup. 09:19	3 fact, use the 14,000 confidential Google documents 09:21
4 MR. PERLSON: Q. Do you want to read your 09:19	4 that you took; correct? 09:21
5 MR. EHRLICH: Please go ahead. 09:19	5 A On the advice and direction of my counsel, I 09:21
6 MS. RAY: Well, he's gotten an instruction 09:19	6 respectfully decline to answer. And I assert the 09:21
7 not to answer; right? 09:19	7 rights guaranteed to me under the Fifth Amendment of 09:22
8 Miles, you're instructing him not to answer? 09:19	8 the Constitution of the United States. 09:22
9 MR. EHRLICH: Yeah, that's a good point. The 09:19	9 Q Throughout the first half of 2016, you used 09:22
10 instruction is not to answer. 09:19	10 the 14,000 confidential Google documents that you took 09:22
And you're going to follow my instruction? 09:19	11 in order to accelerate your development of LiDar 09:22
12 THE WITNESS: I will follow your instruction. 09:19	12 systems at Otto; correct? 09:22
13 MR. EHRLICH: Okay. 09:19	13 A On the advice and direction of my counsel, I 09:22
14 MR. PERLSON: Q. Mr. Levandowski, you and 09:19	14 respectfully decline to answer. And I assert the 09:22
15 Uber discussed how you should exploit Google's 09:20	15 rights guaranteed to me under the Fifth Amendment of 09:22
16 confidential information regarding LiDar technology in 09:20	16 the Constitution of the United States. 09:22
17 a way that wouldn't subject Uber to liability for that 09:20	17 Q And, even while you were employed by Uber, 09:22
18 use; correct? 09:20	18 you used the 14,000 confidential Google documents that 09:22
19 A On the advice and direction of my counsel, I 09:20	19 you took in order to accelerate the development of 09:22
20 respectfully decline to answer. And I assert the 09:20	20 LiDar systems at Uber? 09:24
21 rights guaranteed to me under the Fifth Amendment of 09:20	21 A On the advice and direction of my counsel, I 09:22
22 the Constitution of the United States. 09:20	22 respectfully decline to answer. And I assert the 09:22
23 Q Before you left Google, you and Uber 09:20	23 rights guaranteed to me under the Fifth Amendment of 09:22
24 discussed you starting a new company in January 09:20	24 the Constitution of the United States. 09:22
25 January 2016? 09:20	25 THE WITNESS: Can you stop a minute? The sun 09:22
Page 18	Page 20
1 A On the advice and direction of my counsel, I 09:20	1 has moved, and there's a glare. If we 09:22
, , , , , , , , , , , , , , , , , , , ,	8
2 respectfully decline to answer. And I assert the 09:20	2 MR. PERLSON: Why don't we take a break. 09:22
_	2 MR. PERLSON: Why don't we take a break. 09:22
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21 18 rights guaranteed to me under the Fifth Amendment of 09:21 19 the Constitution of the United States. 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25 18 Q Mr. Levandowski, your use of the 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21 18 rights guaranteed to me under the Fifth Amendment of 09:21 19 the Constitution of the United States. 09:21 20 Q In January of 2016, you and Uber discussed 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25 18 Q Mr. Levandowski, your use of the 09:25 19 14,000 confidential documents you took from Google 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21 18 rights guaranteed to me under the Fifth Amendment of 09:21 19 the Constitution of the United States. 09:21 20 Q In January of 2016, you and Uber discussed 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25 18 Q Mr. Levandowski, your use of the 09:25 19 14,000 confidential documents you took from Google 09:25 20 allowed you to sell Otto to Uber for over \$680 million 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21 18 rights guaranteed to me under the Fifth Amendment of 09:21 19 the Constitution of the United States. 09:21 20 Q In January of 2016, you and Uber discussed 09:21 21 how to cover up the fact that you had taken 14,000 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25 18 Q Mr. Levandowski, your use of the 09:25 19 14,000 confidential documents you took from Google 09:25 20 allowed you to sell Otto to Uber for over \$680 million 09:25 21 in just a few months? 09:25 22 A On the advice and direction of my counsel, I 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21 18 rights guaranteed to me under the Fifth Amendment of 09:21 19 the Constitution of the United States. 09:21 20 Q In January of 2016, you and Uber discussed 09:21 21 how to cover up the fact that you had taken 14,000 09:21 22 confidential documents from Google; correct? 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25 18 Q Mr. Levandowski, your use of the 09:25 19 14,000 confidential documents you took from Google 09:25 20 allowed you to sell Otto to Uber for over \$680 million 09:25 21 in just a few months? 09:25 22 A On the advice and direction of my counsel, I 09:25 23 respectfully decline to answer. And I assert the 09:25 24 respectfully decline to answer. And I assert the 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21 18 rights guaranteed to me under the Fifth Amendment of 09:21 19 the Constitution of the United States. 09:21 20 Q In January of 2016, you and Uber discussed 09:21 21 how to cover up the fact that you had taken 14,000 09:21 22 confidential documents from Google; correct? 09:21 23 A On the advice and direction of my counsel, I 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25 18 Q Mr. Levandowski, your use of the 09:25 19 14,000 confidential documents you took from Google 09:25 20 allowed you to sell Otto to Uber for over \$680 million 09:25 21 in just a few months? 09:25 22 A On the advice and direction of my counsel, I 09:25
2 respectfully decline to answer. And I assert the 09:20 3 rights guaranteed to me under the Fifth Amendment of 09:20 4 the Constitution of the United States. 09:20 5 Q You and Uber decided that you should start a 09:20 6 new company so that you could start exploiting 09:20 7 Google's confidential information without leaving a 09:20 8 trail at Uber; correct? 09:20 9 A On the advice and direction of my counsel, I 09:21 10 respectfully decline to answer. And I assert the 09:21 11 rights guaranteed to me under the Fifth Amendment of 09:21 12 the Constitution of the United States. 09:21 13 Q You and Uber had an understanding by at least 09:21 14 early 2016 that your new company would be acquired by 09:21 15 Uber; correct? 09:21 16 A On the advice and direction of my counsel, I 09:21 17 respectfully decline to answer. And I assert the 09:21 18 rights guaranteed to me under the Fifth Amendment of 09:21 19 the Constitution of the United States. 09:21 20 Q In January of 2016, you and Uber discussed 09:21 21 how to cover up the fact that you had taken 14,000 09:21 22 confidential documents from Google; correct? 09:21 23 A On the advice and direction of my counsel, I 09:21 24 respectfully decline to answer. And I assert the 09:21	2 MR. PERLSON: Why don't we take a break. 09:22 3 THE VIDEOGRAPHER: Going off the record. The 09:23 4 time is 9:22 a.m. 09:23 5 (Recess taken.) 09:23 6 THE VIDEOGRAPHER: We are back on the record. 09:24 7 The time is 9:24 a.m. 09:24 8 MR. PERLSON: Q. Mr. Levandowski, the 09:24 9 14 confident let me start over again. 09:25 10 Mr. Levandowski, the 14,000 confidential 09:25 11 documents that you took from Google allowed you to 09:25 12 develop LiDar systems at Otto more quickly than if 09:25 13 you'd started with a clean sheet design? 09:25 14 A On the advice and direction of my counsel, I 09:25 15 respectfully decline to answer. And I assert the 09:25 16 rights guaranteed to me under the Fifth Amendment of 09:25 17 the Constitution of the United States. 09:25 18 Q Mr. Levandowski, your use of the 09:25 19 14,000 confidential documents you took from Google 09:25 20 allowed you to sell Otto to Uber for over \$680 million 09:25 21 in just a few months? 09:25 22 A On the advice and direction of my counsel, I 09:25 23 respectfully decline to answer. And I assert the 09:25 24 rights guaranteed to me under the Fifth Amendment of 09:25 24 rights guaranteed to me under the Fifth Amendment of 09:25

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 8 of 48 ATTORNEYS EYES ONLY

1 Q You disclosed the status of your development 09:25	1 respectfully decline to answer. And I assert the 09:28
2 of LiDar systems at Otto before the acquisition of 09:25	2 rights guaranteed to me under the Fifth Amendment of 09:28
3 Otto by Uber? 09:25	3 the Constitution of the United States. 09:28
4 A On the advice and direction of my counsel, I 09:26	4 Q You used confidential information from the 09:28
5 respectfully decline to answer. And I assert the 09:26	5 14,000 files you took from Google to develop the Fuji 09:28
6 rights guaranteed to me under the Fifth Amendment of 09:26	6 device at Uber; correct? 09:28
7 the Constitution of the United States. 09:26	7 A On the advice and direction of my counsel, I 09:28
8 O The advanced status of Otto's LiDar systems 09:26	8 respectfully decline to answer. And I assert the 09:28
9 substantially contributed to the value of Otto; 09:26	9 rights guaranteed to me under the Fifth Amendment of 09:28
10 correct? 09:26	10 the Constitution of the United States. 09:28
11 A On the advice and direction of my counsel, I 09:26	11 Q You used confidential information from the 09:28
12 respectfully decline to answer. And I assert the 09:26	12 14,000 files you took from Google to develop the 09:28
13 rights guaranteed to me under the Fifth Amendment of 09:26	device; correct? 09:28
14 the Constitution of the United States. 09:26	14 A On the advice and direction of my counsel, I 09:28
15 Q You understand that Uber paid \$680 million 09:26	15 respectfully decline to answer. And I assert the 09:28
16 for Otto because they knew that Otto had leveraged 09:26	16 rights guaranteed to me under the Fifth Amendment of 09:28
17 Google's confidential information; correct? 09:26	17 the Constitution of the United States. 09:29
18 MS. RAY: Objection; calls for speculation. 09:26	18 Q Without the use of the 14,000 let me start 09:29
19 MR. EHRLICH: Go ahead and answer. 09:26	19 over again. 09:29
20 THE WITNESS: Okay. 09:26	20 Without the use of information from the 09:29
21 On the advice and direction of my counsel, I 09:26	21 14,000 files you took from Google, Otto would not have 09:29
22 respectfully decline to answer. And I assert the 09:26	22 been able to develop any of its LiDar devices; 09:29
23 rights guaranteed to me under the Fifth Amendment of 09:26	23 correct? 09:29
24 the Constitution of the United States. 09:26	24 A On the advice and direction of my counsel, I 09:29
25 MR. PERLSON: Q. Uber told you that they 09:26	25 respectfully decline to answer. And I assert the 09:29
Page 22	Page 24
1 paid \$680 million for Otto because they knew that Otto 09:26	1 rights guaranteed to me under the Fifth Amendment of 09:29
2 had leveraged Google's confidential information? 09:27	2 the Constitution of the United States. 09:29
3 A On the advice and direction of my counsel, I 09:27	3 Q Without the information from the 14,000 files 09:29
4 respectfully decline to answer. And I assert the 09:27	4 you took from Google, Uber would not have been able to 09:29
5 rights guaranteed to me under the Fifth Amendment of 09:27	5 develop any of its LiDar devices; correct? 09:29
6 the Constitution of the United States. 09:27	
o the Constitution of the United States.	6 A On the advice and direction of my counsel, I 09:30
7 Q You used confidential information you took 09:27	6 A On the advice and direction of my counsel, I 09:30 7 respectfully decline to answer. And I assert the 09:30
7 Q You used confidential information you took 09:27	7 respectfully decline to answer. And I assert the 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27 17 Uber; correct? 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30 17 Q Information from the 14,000 files you took 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27 17 Uber; correct? 09:27 18 A On the advice and direction of my counsel, I 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30 17 Q Information from the 14,000 files you took 09:30 18 from Google has made its way onto Uber's servers; 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27 17 Uber; correct? 09:27 18 A On the advice and direction of my counsel, I 09:27 19 respectfully decline to answer. And I assert the 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30 17 Q Information from the 14,000 files you took 09:30 18 from Google has made its way onto Uber's servers; 09:30 19 correct? 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27 17 Uber; correct? 09:27 18 A On the advice and direction of my counsel, I 09:27 19 respectfully decline to answer. And I assert the 09:27 20 rights guaranteed to me under the Fifth Amendment of 09:27	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30 17 Q Information from the 14,000 files you took 09:30 18 from Google has made its way onto Uber's servers; 09:30 19 correct? 09:30 20 A On the advice and direction of my counsel, I 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27 17 Uber; correct? 09:27 18 A On the advice and direction of my counsel, I 09:27 19 respectfully decline to answer. And I assert the 09:27 20 rights guaranteed to me under the Fifth Amendment of 09:27 21 the Constitution of the United States. 09:28	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30 17 Q Information from the 14,000 files you took 09:30 18 from Google has made its way onto Uber's servers; 09:30 19 correct? 09:30 20 A On the advice and direction of my counsel, I 09:30 21 respectfully decline to answer. And I assert the 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27 17 Uber; correct? 09:27 18 A On the advice and direction of my counsel, I 09:27 19 respectfully decline to answer. And I assert the 09:27 20 rights guaranteed to me under the Fifth Amendment of 09:27 21 the Constitution of the United States. 09:28 22 Q You used information from the 14,000 files 09:28	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30 17 Q Information from the 14,000 files you took 09:30 18 from Google has made its way onto Uber's servers; 09:30 19 correct? 09:30 20 A On the advice and direction of my counsel, I 09:30 21 respectfully decline to answer. And I assert the 09:30 22 rights guaranteed to me under the Fifth Amendment 09:30
7 Q You used confidential information you took 09:27 8 from Google to develop LiDar at Uber; correct? 09:27 9 A On the advice and direction of my counsel, I 09:27 10 respectfully decline to answer. And I assert the 09:27 11 rights guaranteed to me under the Fifth Amendment of 09:27 12 the Constitution of the United States. 09:27 13 Q You used information from the 14,000 files 09:27 14 you took from Uber from let me start over again. 09:27 15 You used confidential information from the 09:27 16 14,000 files you took from Google to develop LiDar at 09:27 17 Uber; correct? 09:27 18 A On the advice and direction of my counsel, I 09:27 19 respectfully decline to answer. And I assert the 09:27 20 rights guaranteed to me under the Fifth Amendment of 09:27 21 the Constitution of the United States. 09:28 22 Q You used information from the 14,000 files 09:28 23 you took from Google to develop the device; 09:28	7 respectfully decline to answer. And I assert the 09:30 8 rights guaranteed to me under the Fifth Amendment of 09:30 9 the Constitution of the United States. 09:30 10 Q Uber continues to use information from the 09:30 11 14,000 files you took from Goober from Google to 09:30 12 develop its LiDar systems even today? 09:30 13 A On the advice and direction of my counsel, I 09:30 14 respectfully decline to answer. And I assert the 09:30 15 rights guaranteed to me under the Fifth Amendment of 09:30 16 the Constitution of the United States. 09:30 17 Q Information from the 14,000 files you took 09:30 18 from Google has made its way onto Uber's servers; 09:30 19 correct? 09:30 20 A On the advice and direction of my counsel, I 09:30 21 respectfully decline to answer. And I assert the 09:30 22 rights guaranteed to me under the Fifth Amendment 09:30 23 Q On what 09:30

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 9 of 48 ATTORNEYS EYES ONLY

1 confidential information from the 14,000 files you 09:31	1 follow that instruction. 09:33
2 took from Google reside? 09:31	2 THE WITNESS: On the advice and direction of 09:33
3 MS. RAY: Objection; calls for speculation. 09:31	3 my counsel 09:33
4 MR. EHRLICH: Go ahead and answer. 09:31	4 MR. EHRLICH: Well, so you're not going to 09:33
5 THE WITNESS: On the advice and direction of 09:31	5 answer. 09:33
6 my counsel, I respectfully decline to answer. And I 09:31	6 THE WITNESS: I'm not going to answer? Okay. 09:33
7 assert the rights guaranteed to me under the Fifth 09:31	7 MR. EHRLICH: You're not going to answer on 09:34
8 Amendment of the Constitution of the United States. 09:31	8 the instruction of counsel for Uber. 09:34
9 MR. PERLSON: Q. At least some portion of 09:31	9 THE WITNESS: I will follow advice from 09:34
10 the 14,000 files you took from Google remains on 09:31	10 counsel. 09:34
11 Uber's servers; correct? 09:31	11 MR. PERLSON: Understood. 09:34
12 A On the advice and direction of my counsel, I 09:31	12 I the premise that the only way that he 09:34
13 respectfully decline to answer. And I assert the 09:31	13 could know that information is from counsel is 09:34
14 rights guaranteed to me under the Fifth Amendment of 09:31	14 demonstrably false. But, if you want to make that 09:34
15 the Constitution of the United States. 09:31	15 instruction, you can go right ahead. 09:34
16 Q As head of its self-driving car program, you 09:31	16 MS. RAY: Looking at the question, I don't 09:34
17 agree that Google and Waymo's confidential information 09:32	17 believe that's true. 09:34
18 is the source of all of let me start over again. 09:32	18 MR. PERLSON: You can make your instruction 09:34
19 All of Uber's LiDar designs are a derivative 09:32	19 and live with the consequences of it. 09:34
20 of Google's and Waymo's confidential information that 09:32	20 Do you want me to go on? 09:34
21 you took and used at Uber as head of its self-driving 09:32	21 Q Are you aware that there are entries on the 09:34
22 car program; correct? 09:32	22 privilege log that defendants have served in this case 09:34
23 A On the advice and direction of my counsel, I 09:32	23 as early as January 29th, 2016? 09:34
24 respectfully decline to answer. And I assert the 09:32	24 MS. RAY: Objection. 09:34
25 rights guaranteed to me under the Fifth Amendment of 09:32	25 I instruct you not to answer on the basis of 09:34
Page 26	Page 28
1 the Constitution of the United States. 09:32	1 attorney-client privilege. 09:34
1 the Constitution of the United States. 09:32 2 Q Are you aware that defendants in this case 09:32	1 attorney-client privilege. 09:34 2 MR. EHRLICH: Let me just read this. Excuse 09:34
2 Q Are you aware that defendants in this case 09:32	2 MR. EHRLICH: Let me just read this. Excuse 09:34
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33 18 least in part by you? 09:33 19 MS. RAY: Objection. 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35 18 MR. PERLSON: Okay. I mean, I understand why 09:35 19 you're saying that, but that's not how it works. You 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33 18 least in part by you? 09:33 19 MS. RAY: Objection. 09:33 20 I instruct you not to answer to the extent it 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35 18 MR. PERLSON: Okay. I mean, I understand why 09:35 19 you're saying that, but that's not how it works. You 09:35 20 either answer the question or you don't. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33 18 least in part by you? 09:33 19 MS. RAY: Objection. 09:33 20 I instruct you not to answer to the extent it 09:33 21 calls for attorney-client privileged information. 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35 18 MR. PERLSON: Okay. I mean, I understand why 09:35 19 you're saying that, but that's not how it works. You 09:35 20 either answer the question or you don't. 09:35 21 So, if you want to take a break to figure out 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33 18 least in part by you? 09:33 19 MS. RAY: Objection. 09:33 20 I instruct you not to answer to the extent it 09:33 21 calls for attorney-client privileged information. 09:33 22 The only information he would know is from 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35 18 MR. PERLSON: Okay. I mean, I understand why 09:35 19 you're saying that, but that's not how it works. You 09:35 20 either answer the question or you don't. 09:35 21 So, if you want to take a break to figure out 09:35 22 what the appropriate thing to do is, that's fine. But 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33 18 least in part by you? 09:33 19 MS. RAY: Objection. 09:33 20 I instruct you not to answer to the extent it 09:33 21 calls for attorney-client privileged information. 09:33 22 The only information he would know is from 09:33 23 attorneys. 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35 18 MR. PERLSON: Okay. I mean, I understand why 09:35 19 you're saying that, but that's not how it works. You 09:35 20 either answer the question or you don't. 09:35 21 So, if you want to take a break to figure out 09:35 22 what the appropriate thing to do is, that's fine. But 09:35 23 we don't want to we're not going to waste time. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33 18 least in part by you? 09:33 19 MS. RAY: Objection. 09:33 20 I instruct you not to answer to the extent it 09:33 21 calls for attorney-client privileged information. 09:33 22 The only information he would know is from 09:33 23 attorneys. 09:33 24 I instruct you not to answer. 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35 18 MR. PERLSON: Okay. I mean, I understand why 09:35 19 you're saying that, but that's not how it works. You 09:35 20 either answer the question or you don't. 09:35 21 So, if you want to take a break to figure out 09:35 22 what the appropriate thing to do is, that's fine. But 09:35 23 we don't want to we're not going to waste time. 09:35 24 MS. RAY: Let's go off the record. 09:35
2 Q Are you aware that defendants in this case 09:32 3 have served on plaintiff almost 1,000 pages of 09:32 4 privilege logs? 09:32 5 MS. RAY: Objection. 09:32 6 I instruct you not to answer to the extent 09:32 7 that calls for attorney-client privileged information. 09:32 8 MR. EHRLICH: And, to the extent it doesn't 09:33 9 call for privileged information, I instruct you to 09:33 10 assert your rights. 09:33 11 THE WITNESS: On the advice and direction of 09:33 12 my counsel, I respectfully decline to answer. And I 09:33 13 assert the rights guaranteed to me under the Fifth 09:33 14 Amendment of the Constitution of the United States. 09:33 15 MR. PERLSON: Q. Are you aware that the 09:33 16 basis for nearly every single assertion of privilege 09:33 17 in this document is based on communications made at 09:33 18 least in part by you? 09:33 19 MS. RAY: Objection. 09:33 20 I instruct you not to answer to the extent it 09:33 21 calls for attorney-client privileged information. 09:33 22 The only information he would know is from 09:33 23 attorneys. 09:33	2 MR. EHRLICH: Let me just read this. Excuse 09:34 3 me. 09:35 4 And, to the extent it does not call for 09:35 5 privileged information, I'm going to instruct you to 09:35 6 assert your rights. 09:35 7 MR. PERLSON: Well, she instructed him not to 09:35 8 answer. 09:35 9 So, are you following that instruction? 09:35 10 MR. EHRLICH: I'm going to ask you to follow 09:35 11 that instruction. 09:35 12 THE WITNESS: Okay. 09:35 13 MR. EHRLICH: But to be safe and so the 09:35 14 record is clear, in case there is information that he 09:35 15 may know that is not from a privi privileged 09:35 16 source, I think it's best that he provide an answer 09:35 17 for the record. 09:35 18 MR. PERLSON: Okay. I mean, I understand why 09:35 19 you're saying that, but that's not how it works. You 09:35 20 either answer the question or you don't. 09:35 21 So, if you want to take a break to figure out 09:35 22 what the appropriate thing to do is, that's fine. But 09:35 23 we don't want to we're not going to waste time. 09:35

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 10 of 48 ATTORNEYS EYES ONLY

1 the only I respect that Uber is making a privileged 09:35	1 Q When did you first start discussing an 09:38
2 objection. 09:35	2 acquisition of what would become Ottomoto with Uber? 09:38
3 I want to make sure that nothing 09:35	3 A On the advice and direction of my counsel, I 09:38
4 Mr. Levandowski does undermines the privilege that 09:36	4 respectfully decline to answer. And I assert the 09:38
5 Uber is asserting. 09:36	5 rights guaranteed to me under the Fifth Amendment of 09:38
6 If to the extent it's a common interest 09:36	6 the Constitution of the United States. 09:38
7 privilege, I would be advising Mr. Levandowski to 09:36	7 Q When did you first receive any let me 09:38
8 assert it as well. 09:36	8 start over again. 09:38
9 But I just want I just want to be clear. 09:36	9 When was your first attorney-client 09:38
10 I'm not I think if there is an answer that's 09:36	10 communication with Eric Tate at Morrison & Foerster 09:38
11 required, I'm going to instruct him to assert his 09:36	11 regarding the acquisition of Ottomoto? 09:38
12 rights. 09:36	12 A On the advice and direction of my counsel, I 09:38
13 MR. PERLSON: Okay. I think once again, I 09:36	13 respectfully decline to answer. And I assert the 09:38
14 think the objection is improper. 09:36	14 rights guaranteed to me under the Fifth Amendment of 09:38
15 Q But, are you going to follow are you going 09:36	15 the Constitution of the United States. 09:39
16 to follow Uber's instructions 09:36	16 Q When did you first enter into a joint defense 09:39
17 A I'm going to follow 09:36	17 agreement let me start over again. 09:39
18 Q not to answer the question? 09:36	When did you first enter into a common 09:39
19 A I'm going to follow Miles' instructions. 09:36	19 interest agreement with Uber regarding a potential 09:39
20 MR. EHRLICH: And I'm going to ask him to 09:36	20 acquisition of Otto? 09:39
21 follow that instruction. 09:36	21 A On the advice and direction of my counsel, I 09:39
22 MR. PERLSON: Okay. 09:36	22 respectfully decline to answer. And I assert the 09:39
23 THE WITNESS: So that means I follow 09:36	23 rights guaranteed to me under the Fifth Amendment of 09:39
24 MR. EHRLICH: So we can move on. 09:36	24 the Constitution of the United States. 09:39
25 MR. PERLSON: Okay. 09:36	25 Q What common interest do you have with Uber 09:39
Page 30	Page 32
1 Q January 29, 2016, is within days of you 09:36	1 regarding a potential acquisition of Otto? 09:39
2 leaving Google; correct? 09:37	2 MS. RAY: I instruct you not to answer on the 09:39
3 A On the advice and direction of my counsel, I 09:37	3 basis of attorney-client privilege. 09:39
4 respectfully decline to answer. And I assert the 09:37	4 MR. PERLSON: Again, I don't think that's a 09:39
5 rights guaranteed to me under the Fifth Amendment of 09:37	
5 fights guaranteed to the under the first function of 07.57	5 proper instruction. 09:39
6 the Constitution of the United States. 09:37	5 proper instruction. 09:39 6 Q But, do you want to are you following 09:39
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37	
6 the Constitution of the United States. 09:37	6 Q But, do you want to are you following 09:39
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37 19 Q When did you first start receiving legal 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40 19 What what common interest did Otto have 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37 19 Q When did you first start receiving legal 09:37 20 advice regarding an acquisition of the company that 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40 19 What what common interest did Otto have 09:40 20 with Uber regarding a potential acquisition of Otto? 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37 19 Q When did you first start receiving legal 09:37 20 advice regarding an acquisition of the company that 09:37 21 would become Ottomoto? 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40 19 What what common interest did Otto have 09:40 20 with Uber regarding a potential acquisition of Otto? 09:40 21 MS. RAY: I instruct you not to answer on the 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37 19 Q When did you first start receiving legal 09:37 20 advice regarding an acquisition of the company that 09:37 21 would become Ottomoto? 09:37 22 A On the advice and direction of my counsel, I 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40 19 What what common interest did Otto have 09:40 20 with Uber regarding a potential acquisition of Otto? 09:40 21 MS. RAY: I instruct you not to answer on the 09:40 22 basis of attorney-client privilege and common interest 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37 19 Q When did you first start receiving legal 09:37 20 advice regarding an acquisition of the company that 09:37 21 would become Ottomoto? 09:37 22 A On the advice and direction of my counsel, I 09:37 23 respectfully decline to answer. And I assert the 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40 19 What what common interest did Otto have 09:40 20 with Uber regarding a potential acquisition of Otto? 09:40 21 MS. RAY: I instruct you not to answer on the 09:40 22 basis of attorney-client privilege and common interest 09:40 23 privilege. 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37 19 Q When did you first start receiving legal 09:37 20 advice regarding an acquisition of the company that 09:37 21 would become Ottomoto? 09:37 22 A On the advice and direction of my counsel, I 09:37 23 respectfully decline to answer. And I assert the 09:37 24 rights guaranteed to me under the Fifth Amendment of 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40 19 What what common interest did Otto have 09:40 20 with Uber regarding a potential acquisition of Otto? 09:40 21 MS. RAY: I instruct you not to answer on the 09:40 22 basis of attorney-client privilege and common interest 09:40 23 privilege. 09:40 24 MR. EHRLICH: And same instruction from me to 09:40
6 the Constitution of the United States. 09:37 7 Q On January 29, 2016, were you receiving legal 09:37 8 advice regarding due diligence for an acquisition of 09:37 9 Ottomoto? 09:37 10 A On the advice and direction of my counsel, I 09:37 11 respectfully decline to answer. And I assert the 09:37 12 rights guaranteed to me under the Fifth Amendment of 09:37 13 the Constitution of the United States. 09:37 14 Q Did Ottomoto exist on January 29, 2016? 09:37 15 A On the advice and direction of my counsel, I 09:37 16 respectfully decline to answer. And I assert the 09:37 17 rights guaranteed to me under the Fifth Amendment of 09:37 18 the Constitution of the United States. 09:37 19 Q When did you first start receiving legal 09:37 20 advice regarding an acquisition of the company that 09:37 21 would become Ottomoto? 09:37 22 A On the advice and direction of my counsel, I 09:37 23 respectfully decline to answer. And I assert the 09:37	6 Q But, do you want to are you following 09:39 7 Uber's advice or instruction? 09:39 8 MR. EHRLICH: Let me look at the question. 09:39 9 I'm sorry. 09:39 10 THE VIDEOGRAPHER: Just cover your mic. 09:40 11 (Soto-voce discussion.) 09:40 12 MR. EHRLICH: Okay. I'm going to accept that 09:40 13 instruction and and advise you to follow it and 09:40 14 decline to answer. 09:40 15 THE WITNESS: I'm going to follow the advice. 09:40 16 MR. PERLSON: Q. What common interest did 09:40 17 Otto have with Uber regarding an acquisition by 09:40 18 Otto let me start over again. 09:40 19 What what common interest did Otto have 09:40 20 with Uber regarding a potential acquisition of Otto? 09:40 21 MS. RAY: I instruct you not to answer on the 09:40 22 basis of attorney-client privilege and common interest 09:40 23 privilege. 09:40

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 11 of 48 ATTORNEYS EYES ONLY

1 THE WITNESS: Okay. I will follow that 09:40	1 MR. PERLSON: Do you want to go off the
2 advice. 09:40	2 record?
3 MR. PERLSON: Q. Did you anticipate 09:41	3 THE WITNESS: Yeah, why don't we do that.
4 litigation regarding a potential acquisition of Otto 09:41	4 THE VIDEOGRAPHER: Going off the record. The
5 in as early as January 29, 2016? 09:41	5 time is 9:44.
6 A On the advice and direction of my counsel, I 09:41	6 (Recess taken.) 09:52
7 respectfully decline to answer. And I assert the 09:41	7 THE VIDEOGRAPHER: We are back on the record. 09:52
8 rights guaranteed to me under the Fifth Amendment of 09:41	8 The time is 9:53. 09:53
9 the Constitution of the United States. 09:41	9 MR. PERLSON: Q. Are you going to follow 09:53
10 Q Did Otto anticipate litigation regarding a 09:41	10 your counsel's instruction? 09:53
11 potential acquisition of Otto as early as January 29, 09:41	11 THE WITNESS: Do we have any question? 09:53
12 2016? 09:42	12 MR. EHRLICH: Let me let me go back. 09:53
13 A On the advice and direction of my counsel, I 09:42	13 MS. RAY: I instructed him not to answer. 09:53
14 respectfully decline to answer. And I assert the 09:42	14 MR. EHRLICH: Okay. Ms. Ray instructed him 09:53
15 rights guaranteed to me under the Fifth Amendment of 09:42	15 not to answer. 09:53
16 the Constitution of the United States. 09:42	16 And I will now instruct you to follow that 09:53
17 Q When did Otto first anticipate litigation 09:42	17 instruction from Ms. Ray on the basis of 09:53
18 regarding a potential acquisition of Otto? 09:42	18 attorney-client privilege. 09:53
19 A On the advice and direction of my counsel, I 09:42	19 THE WITNESS: I'll follow that instruction. 09:53
20 respectfully decline to answer. And I assert the 09:42	20 MR. PERLSON: Q. Isn't it correct that the 09:53
21 rights guaranteed to me under the Fifth Amendment of 09:42	21 common interest that Otto and Uber had in anticipation 09:54
22 the Constitution of the United States. 09:42	22 of litigation regarding the Otto acquisition was 09:54
23 Q When did Uber first anticipate litigation 09:42	23 exploiting the confidential information you had 09:54
24 regarding a potential acquisition of Otto? 09:42	24 taken in the 14,000 documents you had taken from 09:54
25 MS. RAY: Objection; calls for speculation. 09:42	25 Google? 09:54
Page 34	Page 36
1 MR. EHRLICH: You can answer. 09:42	1 MS. RAY: Objection; form. 09:54
2 THE WITNESS: Okay. 09:42	2 I instruct you not to answer on the basis of 09:54
3 On the advice and direction of my counsel, I 09:42	3 attorney-client and common interest privilege. 09:54
4 respectfully decline to answer. And I assert the 09:42	4 MR. EHRLICH: And the same instruction from 09:54
5 rights guaranteed to me under the Fifth Amendment of 09:42	5 me to follow that instruction. 09:54
6 the Constitution of the United States. 09:42	6 THE WITNESS: I will follow that instruction. 09:54
7 MR. PERLSON: Q. When did Uber first tell 09:42	7 MR. PERLSON: Q. Your common interest with 09:54
8 you they anticipated litigation regarding a potential 09:42	8 Uber began while you were still employed at Google; 09:54
9 acquisition of Otto? 09:42	9 correct? 09:54
10 A On the advice and direction of my counsel, I 09:42	10 MS. RAY: Objection; form. 09:54
11 respectfully decline to answer. And I assert the 09:42	
	MR. EHRLICH: And and by "form," Counsel, 09:54
12 rights guaranteed to me under the Fifth Amendment of 09:42	12 do you mean attorney-client privilege? 09:54
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43 19 A On the advice and 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55 19 answer. And I assert the rights guaranteed to me 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43 19 A On the advice and 09:43 20 MS. RAY: Objection; form. 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55 19 answer. And I assert the rights guaranteed to me 09:55 20 under the Fifth Amendment of the Constitution of the 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43 19 A On the advice and 09:43 20 MS. RAY: Objection; form. 09:43 21 MR. EHRLICH: You can go ahead and answer. 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55 19 answer. And I assert the rights guaranteed to me 09:55 20 under the Fifth Amendment of the Constitution of the 09:55 21 United States. 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43 19 A On the advice and 09:43 20 MS. RAY: Objection; form. 09:43 21 MR. EHRLICH: You can go ahead and answer. 09:43 22 MS. RAY: Hold on. 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55 19 answer. And I assert the rights guaranteed to me 09:55 20 under the Fifth Amendment of the Constitution of the 09:55 21 United States. 09:55 22 MR. PERLSON: Q. Otto's common interest with 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43 19 A On the advice and 09:43 20 MS. RAY: Objection; form. 09:43 21 MR. EHRLICH: You can go ahead and answer. 09:43 22 MS. RAY: Hold on. 09:43 23 I instruct you not to answer on the basis of 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55 19 answer. And I assert the rights guaranteed to me 09:55 20 under the Fifth Amendment of the Constitution of the 09:55 21 United States. 09:55 22 MR. PERLSON: Q. Otto's common interest with 09:55 23 Uber began while you were still employed at Google? 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43 19 A On the advice and 09:43 20 MS. RAY: Objection; form. 09:43 21 MR. EHRLICH: You can go ahead and answer. 09:43 22 MS. RAY: Hold on. 09:43 23 I instruct you not to answer on the basis of 09:43 24 attorney-client privilege. 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55 19 answer. And I assert the rights guaranteed to me 09:55 20 under the Fifth Amendment of the Constitution of the 09:55 21 United States. 09:55 22 MR. PERLSON: Q. Otto's common interest with 09:55 23 Uber began while you were still employed at Google? 09:55 24 MS. RAY: Objection; form. 09:55
12 rights guaranteed to me under the Fifth Amendment of 09:42 13 the Constitution of the United States. 09:43 14 Q Isn't it correct that the common interest 09:43 15 that Otto and Uber had, in anticipation of litigation 09:43 16 regarding the Otto acquisition was concealing the fact 09:43 17 that you had taken 14,000 confidential documents from 09:43 18 Google? 09:43 19 A On the advice and 09:43 20 MS. RAY: Objection; form. 09:43 21 MR. EHRLICH: You can go ahead and answer. 09:43 22 MS. RAY: Hold on. 09:43 23 I instruct you not to answer on the basis of 09:43	12 do you mean attorney-client privilege? 09:54 13 MS. RAY: No. I mean that it's a legal 09:55 14 conclusion what common interest is. I don't think he 09:55 15 knows what that is. So, it's speculation. 09:55 16 MR. EHRLICH: Okay. So, you can answer. 09:55 17 THE WITNESS: On on the advice and 09:55 18 direction of my counsel, I respectfully decline to 09:55 19 answer. And I assert the rights guaranteed to me 09:55 20 under the Fifth Amendment of the Constitution of the 09:55 21 United States. 09:55 22 MR. PERLSON: Q. Otto's common interest with 09:55 23 Uber began while you were still employed at Google? 09:55

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 12 of 48 ATTORNEYS EYES ONLY

1 my counsel, I respectfully decline to answer. And I 09:55	1 look at your question. 09:57
2 assert the rights guaranteed to me under the Fifth 09:55	2 MR. PERLSON: Take take the time you need. 09:57
3 Amendment of the Constitution of the United States. 09:55	3 MS. RAY: So, you have asked the witness a 09:57
4 MR. PERLSON: Q. Otto's common interest with 09:55	4 question about the common interest; right? You're 09:57
5 Uber was to prevent the detection of your scheme to 09:55	5 saying 09:57
6 funnel Waymo's technology to Uber via Otto? 09:55	6 MR. PERLSON: You you made the 09:57
7 MS. RAY: Objection to form. 09:55	7 instruction. 09:57
8 I instruct you not to answer on the basis of 09:55	8 MS. RAY: I understand. 09:57
9 attorney-client and common interest privilege. 09:55	9 MR. PERLSON: You need to know what it is. 09:57
10 MR. EHRLICH: And I'll advise you to follow 09:56	10 If you if we want to stop, get off the 09:57
11 that instruction from Counsel. 09:56	11 record, so you can figure out why you made your 09:57
MR. PERLSON: And whose who are the 09:56	12 attorney-client privilege instruction, then you can do 09:57
13 what common interest are you asserting then? Between 09:56	13 that. 09:57
14 who is it with? 09:56	But, I would suspect that, when you made the 09:57
15 And who is the attorney and the client in 09:56	15 instruction, that you know 09:57
16 your instruction? 09:56	16 MS. RAY: I do know. 09:57
MS. RAY: Your question is about Otto's 09:56	MR. PERLSON: the answer to the question. 09:57
18 interests with Uber. And so, at the time, I believe 09:56	18 So answer me, please. 09:57
19 Otto's attorneys were O'Melveny & Myers, and Uber's 09:56	19 MS. RAY: I'm happy to answer you. 09:57
20 counsel was Morrison & Foerster. And you're making an 09:56	20 MR. PERLSON: Okay. 09:57
21 assertion about the common interest, so we wouldn't 09:56	21 MS. RAY: You want to be taught. 09:57
22 agree with that. 09:56	22 MR. PERLSON: Go. 09:57
MR. PERLSON: Well, that's not a basis for an 09:56	MS. RAY: You were asking him about what the 09:58
24 attorney-client privilege instruction, so 09:56	24 common interest is. The only way he would know that 09:58
MS. RAY: You're asking him what the interest 09:56	25 is from an attorney discussion. And so, that is 09:58
Page 38	Page 40
ng	
1 is. And one, he doesn't know because he doesn't 09:56	1 attorney-client privilege, and I'm not going to let 09:58
	1 attorney-client privilege, and I'm not going to let 09:58 2 him answer the question. 09:58
1 is. And one, he doesn't know because he doesn't 09:56	
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56	2 him answer the question. 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58 18 says on here on here that I am coaching. But I 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57 17 discuss that at 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57 17 discuss that at 09:57 18 MR. PERLSON: Are you refusing to provide 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58 18 says on here on here that I am coaching. But I 09:58
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57 17 discuss that at 09:57 18 MR. PERLSON: Are you refusing to provide 09:57 19 this information now? This is a very serious issue, 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58 18 says on here on here that I am coaching. But I 09:58 19 meant to say, if I didn't say it correctly, I am not 09:59
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57 17 discuss that at 09:57 18 MR. PERLSON: Are you refusing to provide 09:57 19 this information now? This is a very serious issue, 09:57 20 and I need an answer. 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58 18 says on here on here that I am coaching. But I 09:58 19 meant to say, if I didn't say it correctly, I am not 09:59 20 coaching. 09:59
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57 17 discuss that at 09:57 18 MR. PERLSON: Are you refusing to provide 09:57 19 this information now? This is a very serious issue, 09:57 20 and I need an answer. 09:57 21 MS. RAY: We can go if you want, we can go 09:57 22 off the record. 09:57 23 MR. PERLSON: No. I want you to put this on 09:57	2 him answer the question. 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58 18 says on here on here that I am coaching. But I 09:58 19 meant to say, if I didn't say it correctly, I am not 09:59 20 coaching. 09:59 21 MR. PERLSON: Q. Isn't it correct that the 09:59 22 common interest that Otto and Uber had in in 09:59 23 anticipation of litigation, regarding the Otto 09:59
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57 17 discuss that at 09:57 18 MR. PERLSON: Are you refusing to provide 09:57 19 this information now? This is a very serious issue, 09:57 20 and I need an answer. 09:57 21 MS. RAY: We can go if you want, we can go 09:57 22 off the record. 09:57	2 him answer the question. 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58 18 says on here on here that I am coaching. But I 09:58 19 meant to say, if I didn't say it correctly, I am not 09:59 20 coaching. 09:59 21 MR. PERLSON: Q. Isn't it correct that the 09:59 22 common interest that Otto and Uber had in in 09:59
1 is. And one, he doesn't know because he doesn't 09:56 2 he's not a lawyer. He doesn't 09:56 3 MR. PERLSON: Hey, hey, enough of the 09:56 4 coaching. 09:56 5 MS. RAY: I'm not coaching. 09:56 6 MR. PERLSON: If you want to make an an 09:56 7 I am I am asking a very specific question. 09:57 8 MS. RAY: You asked me a question 09:57 9 MR. PERLSON: You instructed him not to 09:57 10 answer on the basis of attorney-client privilege. You 09:57 11 don't need to get into speculation or anything about 09:57 12 that. 09:57 13 Answer my question: What is the common 09:57 14 interest you're identifying? And who are the 09:57 15 attorneys? And who is the client? 09:57 16 MS. RAY: I'm not being deposed here. We can 09:57 17 discuss that at 09:57 18 MR. PERLSON: Are you refusing to provide 09:57 19 this information now? This is a very serious issue, 09:57 20 and I need an answer. 09:57 21 MS. RAY: We can go if you want, we can go 09:57 22 off the record. 09:57 23 MR. PERLSON: No. I want you to put this on 09:57	2 him answer the question. 09:58 3 MR. PERLSON: Who is the attorney? Who is 09:58 4 the client? 09:58 5 MS. RAY: I already identified that to you. 09:58 6 MR. PERLSON: When? In this question 09:58 7 MS. RAY: Do you want me to ask the reporter 09:58 8 to read it back? I'm happy to repeat it. 09:58 9 Otto's attorneys were O'Melveny & Myers, and 09:58 10 Uber's counsel was Morrison & Foerster. Those are the 09:58 11 attorneys. 09:58 12 MR. PERLSON: Okay. And what's the common 09:58 13 interest, and who is it between? 09:58 14 MS. RAY: The common interest was between 09:58 15 Otto and Uber, at least as to your question, and it 09:58 16 was in anticipation of litigation. 09:58 17 Also, I just want to note that the record 09:58 18 says on here on here that I am coaching. But I 09:58 19 meant to say, if I didn't say it correctly, I am not 09:59 20 coaching. 09:59 21 MR. PERLSON: Q. Isn't it correct that the 09:59 22 common interest that Otto and Uber had in in 09:59 23 anticipation of litigation, regarding the Otto 09:59

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 13 of 48 ATTORNEYS EYES ONLY

1 had that's not the question. Let's start over 09:59 2 again. 09:59	1 MR. EHRLICH: I advise you to follow that 10:02 2 instruction. 10:02
3 Isn't it correct that, before you left 09:59	3 THE WITNESS: I will follow that instruction. 10:02
4 Google, there was a common interest between Otto and 09:59	4 MR. PERLSON: Q. As part of the due 10:02
5 Uber to prevent the detection of your scheme to funnel 09:59	5 diligence report that was done in connection with the 10:02
6 Waymo's technology to Uber via Otto? 09:59	6 Otto acquisition, someone examined all of the computer 10:02
7 MS. RAY: Objection; form. 10:00	7 systems at Otto for Google con confidential 10:02
8 MR. EHRLICH: And and, Ms. Ray, is there 10:00	8 information; correct? 10:02
9 an objection based on attorney-client privilege or 10:00	9 MS. RAY: I instruct you not to answer on the 10:02
10 joint or common interest privilege? 10:00	10 basis of attorney-client and common interest 10:03
MS. RAY: I instruct you not to answer on the 10:00	11 privilege. 10:03
12 basis of attorney-client or common interest privilege. 10:00	12 MR. PERLSON: Q. As part of the due 10:03
13 MR. EHRLICH: So so I would ask you to 10:00	13 diligence report, in connection with the Otto 10:03
14 follow that instruction and decline to answer. 10:00	14 acquisition, someone examined all the computer systems 10:03
15 MR. PERLSON: And that's based on the same 10:00	15 at Otto for the 14,000 documents you had taken from 10:03
16 common interest and the same attorneys that you had 10:00	16 Google? 10:03
17 noted in reference to the last question; correct? 10:00	17 MS. RAY: Same instruction. 10:03
18 MS. RAY: Yes, sir. I'm not agreeing to your 10:00	18 MR. PERLSON: Q. Are you following that 10:03
19 timing or characterization. 10:00	19 instruction? 10:03
20 MR. PERLSON: I'm just asking you the basis 10:00	20 A (Witness nods head.) 10:03
21 of the instruction. 10:00	21 Q "Yes"? 10:03
MS. RAY: The basis of the instruction is 10:00	22 A Yes. I'm sorry. No gestures. 10:03
23 that the only way he knows about the common interest 10:00	23 But you didn't let me answer the last one, 10:03
24 is because of attorney-client privileged discussions. 10:00	24 so 10:03
25 MR. PERLSON: I just want the record to be 10:01	25 MR. EHRLICH: Go ahead. You're following 10:03
Page 42	Page 44
1 very clear that the attorney-clients the attorney 10:01	1 that instruction? 10:03
2 and the client and the common interest that you are 10:01	2 THE WITNESS: I'm following that instruction. 10:03
3 basing your instruction on, is the same one that you 10:01	3 MR. PERLSON: Thank you. 10:03
4 had based your instruction on in the current in the 10:01	4 Q As part of the due diligence report in 10:03
5 previous question. 10:01	5 connection with the Otto acquisition, it was 10:03
6 MS. RAY: Correct, without buying into your 10:01	6 determined that the 14,000 files that you had taken 10:03
7 presumption about the timing. 10:01	7 from Google did exist on Otto's servers; correct? 10:04
8 THE REPORTER: Excuse me, Counsel. You're 10:01	8 MS. RAY: Same same instruction. 10:04
9 not mic'ed, so if you can try to keep your hand away. 10:01	9 MR. EHRLICH: And same instruction from me. 10:04
10 MS. RAY: Oh, sure. I'm sorry. 10:01	10 THE WITNESS: And I'm following. 10:04
11 MR. PERLSON: Q. At the time Uber acquired 10:01	11 MR. PERLSON: Q. As part of the due 10:04
12 Otto, Uber had a due diligence report done in 10:01	12 diligence report in connection with the Otto 10:04
13 connection with that acquisition; correct? 10:01	13 acquisition, it was determined that the 14,000 files 10:04
14 A On the advice and direction of my counsel, I 10:02	14 that had been taken by you from Google should be 10:04
15 respectfully decline to answer. And I assert the 10:02	15 deleted from Otto's servers; correct? 10:04
16 rights guaranteed to me under the Fifth Amendment of 10:02	16 MS. RAY: Same instruction. 10:04
17 the Constitution of the United States. 10:02	17 MR. EHRLICH: Same instruction, as well, from 10:04
18 Q The purpose of the due diligence report done 10:02	18 me. 10:04
19 before the Uber's acquisition of Otto was to 10:02	19 THE WITNESS: I will follow. 10:04
20 determine the potential exposure for your theft of 10:02	20 MR. PERLSON: Q. If Uber had a third-party 10:04
21 confidential information from Google? 10:02	21 report done in connection with the Otto acquisition, 10:05
21 confidential information from Google? 10:02 22 MR. EHRLICH: Hold on. 10:02	
	21 report done in connection with the Otto acquisition, 10:05
22 MR. EHRLICH: Hold on. 10:02	21 report done in connection with the Otto acquisition, 10:05 22 and got a clean bill of health on Otto, why wouldn't 10:05
22 MR. EHRLICH: Hold on. 10:02 23 MS. RAY: I instruct you not to answer on the 10:02	21 report done in connection with the Otto acquisition, 10:05 22 and got a clean bill of health on Otto, why wouldn't 10:05 23 Uber share that with Waymo? 10:05

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 14 of 48 ATTORNEYS EYES ONLY

I .	
1 Go ahead. 10:05	1 The time is 10:07. 10:07
2 MR. EHRLICH: I'm looking so, there is 10:05	2 MR. PERLSON: Q. There would be no reason 10:07
3 an there is an objection on form. I'm not hearing 10:05	3 for you to withhold exculpatory evidence regarding the 10:08
4 an objection based on attorney-client or joint defense 10:05	4 14,000 files you took from Google; correct? 10:08
5 privilege. 10:05	5 A On the advice and direction of my counsel, I 10:08
6 So, you can answer. 10:05	6 respectfully decline to answer. And I assert the 10:08
7 THE WITNESS: On the advice and direction of 10:05	7 rights guaranteed to me under the Fifth Amendment of 10:08
8 my counsel, I respectfully decline to answer. And I 10:05	8 the Constitution of the United States. 10:08
9 assert the rights guaranteed to me under the Fifth 10:05	9 Q When did you first suspect that your conduct 10:08
10 Amendment of the Constitution of the United States. 10:05	10 at Google might become the subject of litigation? 10:08
MR. PERLSON: Q. If Uber had a third-party 10:05	11 A On the advice and direction of my counsel, I 10:08
12 report done in connection with the Otto acquisition 10:06	12 respectfully decline to answer. And I assert the 10:08
13 and got a clean bill of health on Otto, why wouldn't 10:06	13 rights guaranteed to me under the Fifth Amendment of 10:08
14 Uber share that with the Court? 10:06	14 the Constitution of the United States. 10:08
15 MS. RAY: Objection; form. 10:06	15 Q Did you ever suspect that your operation 10:08
THE VIDEOGRAPHER: Excuse me. Can you use 10:06	16 of let me start over again. 10:09
17 this? 10:06	17 Did you ever suspect that your discussions 10:09
18 MS. RAY: Sure. 10:06	18 with Uber between 2015 and 2016, while you were a 10:09
19 THE VIDEOGRAPHER: Is it going to reach? 10:06	19 Google employee, would become the subject of 10:09
20 MS. RAY: You know what, can we just move 10:06	20 litigation? 10:09
21 that? 10:06	21 MS. RAY: Objection; form. 10:09
MR. EHRLICH: I'm going to instruct you to 10:06	22 MR. EHRLICH: Go ahead. 10:09
23 answer. 10:06	23 THE WITNESS: On the advice and direction of 10:09
24 THE WITNESS: On the advice and direction of 10:06	24 my counsel, I respectfully decline to answer. And I 10:09
25 my counsel, I respectfully decline to answer. And I 10:06 Page 46	25 assert the rights guaranteed to me under the Fifth 10:09 Page 48
	<u> </u>
1 assert the rights guaranteed to me under the Fifth 10:06	1 Amendment of the Constitution of the United States. 10:09
2 Amendment of the Constitution of the United States. 10:06	2 MR. PERLSON: Q. Did you ever suspect that 10:09
3 MR. PERLSON: Q. It would be in Uber's 10:06	3 your formation of of a company, that eventually 10:09
4 interests to provide exculpatory evidence regarding 10:06	4 became Otto in late 2015, while you were still a 10:09
5 the 14,000 files you took from Google; correct? 10:06	5 Google employee, would become the subject of 10:09
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07 19 THE VIDEOGRAPHER: Excuse me. I'd like to go 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10 19 A On the advice and direction of my counsel, I 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07 19 THE VIDEOGRAPHER: Excuse me. I'd like to go 10:07 20 off the record for one moment. 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10 19 A On the advice and direction of my counsel, I 10:10 20 respectfully decline to answer. And I assert the 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07 19 THE VIDEOGRAPHER: Excuse me. I'd like to go 10:07 20 off the record for one moment. 10:07	5 Google employee, would become the subject of 10:09 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10 19 A On the advice and direction of my counsel, I 10:10 20 respectfully decline to answer. And I assert the 10:10 21 rights guaranteed to me under the Fifth Amendment of 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07 19 THE VIDEOGRAPHER: Excuse me. I'd like to go 10:07 20 off the record for one moment. 10:07 21 MR. PERLSON: Sure. 10:07 22 THE VIDEOGRAPHER: Going off the record. The 10:07	5 Google employee, would become the subject of 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10 19 A On the advice and direction of my counsel, I 10:10 20 respectfully decline to answer. And I assert the 10:10 21 rights guaranteed to me under the Fifth Amendment of 10:10 22 the Constitution of the United States. 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07 19 THE VIDEOGRAPHER: Excuse me. I'd like to go 10:07 20 off the record for one moment. 10:07 21 MR. PERLSON: Sure. 10:07 22 THE VIDEOGRAPHER: Going off the record. The 10:07 23 time is 10:07. 10:07	5 Google employee, would become the subject of 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10 19 A On the advice and direction of my counsel, I 10:10 20 respectfully decline to answer. And I assert the 10:10 21 rights guaranteed to me under the Fifth Amendment of 10:10 22 the Constitution of the United States. 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07 19 THE VIDEOGRAPHER: Excuse me. I'd like to go 10:07 20 off the record for one moment. 10:07 21 MR. PERLSON: Sure. 10:07 22 THE VIDEOGRAPHER: Going off the record. The 10:07 23 time is 10:07. 10:07 24 (Recess taken.) 10:07	5 Google employee, would become the subject of 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10 19 A On the advice and direction of my counsel, I 10:10 20 respectfully decline to answer. And I assert the 10:10 21 rights guaranteed to me under the Fifth Amendment of 10:10 22 the Constitution of the United States. 10:10 23 Q Has Otto deleted any documents related to 10:10 24 this litigation? 10:10
5 the 14,000 files you took from Google; correct? 10:06 6 MS. RAY: Objection; form. 10:07 7 MR. EHRLICH: You can answer. 10:07 8 THE WITNESS: On the advice and direction of 10:07 9 my counsel, I respectfully decline to answer. And I 10:07 10 assert the rights guaranteed to me under the Fifth 10:07 11 Amendment of the Constitution of the United States. 10:07 12 MR. PERLSON: Q. It would be in your 10:07 13 interests to provide exculpatory evidence regarding 10:07 14 the 14,000 files you took from Google; correct? 10:07 15 A On the advice and direction of my counsel, I 10:07 16 respectfully decline to answer. And I assert the 10:07 17 rights guaranteed to me under the Fifth Amendment of 10:07 18 the Constitution of the United States. 10:07 19 THE VIDEOGRAPHER: Excuse me. I'd like to go 10:07 20 off the record for one moment. 10:07 21 MR. PERLSON: Sure. 10:07 22 THE VIDEOGRAPHER: Going off the record. The 10:07 23 time is 10:07. 10:07	5 Google employee, would become the subject of 6 litigation? 10:09 7 A On the advice and direction of my counsel, I 10:09 8 respectfully decline to answer. And I assert the 10:09 9 rights guaranteed to me under the Fifth Amendment of 10:09 10 the Constitution of the United States. 10:10 11 Q Have you ever destroyed any documents related 10:10 12 to this litigation? 10:10 13 A On the advice and direction of my counsel, I 10:10 14 respectfully decline to answer. And I assert the 10:10 15 rights guaranteed to me under the Fifth Amendment of 10:10 16 the Constitution of the United States. 10:10 17 Q Have you ever deleted any documents related 10:10 18 to this litigation? 10:10 19 A On the advice and direction of my counsel, I 10:10 20 respectfully decline to answer. And I assert the 10:10 21 rights guaranteed to me under the Fifth Amendment of 10:10 22 the Constitution of the United States. 10:10

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 15 of 48 ATTORNEYS EYES ONLY

1 respectfully decline to answer. And I assert the 10:10	1 the United States. 10:13
2 rights guaranteed to me under the Fifth Amendment of 10:10	2 Q To this day, Uber continues to use 10:13
3 the Constitution of the United States. 10:10	3 confidential information downloaded onto that laptop 10:13
4 Q Have you deleted any documents reflecting 10:10	4 computer; correct? 10:13
5 your relationship to Odin Wave or Tyto Lidar at any 10:10	5 A On the advice and direction of my counsel, I 10:13
6 time in which you had anticipated litigation? 10:10	6 respectfully decline to answer. And I assert the 10:13
7 A On the advice and direction of my counsel, I 10:10	7 rights guaranteed to me under the Fifth Amendment of 10:13
8 respectfully decline to answer. And I assert the 10:10	8 the Constitution of the United States. 10:13
9 rights guaranteed to me under the Fifth Amendment of 10:10	9 Q Is there any wall at Uber from your work on 10:13
10 the Constitution of the United States. 10:11	10 LiDar technology? 10:14
11 Q Have you ever destroyed or permanently 10:11	11 A What's a wall? 10:14
12 deleted any documents relating to this litigation when 10:11	12 Q Is are 10:14
13 litiga during the time in which litigation was 10:11	13 MR. EHRLICH: Do you want to clarify? 10:14
14 anticipated, regarding the Otto acquisition? 10:11	14 MR. PERLSON: Yeah, sure. 10:14
15 A On the advice and direction of my counsel, I 10:11	15 Q The is is there any policy at Uber that 10:14
16 respectfully decline to answer. And I assert the 10:11	16 you are not allowed to work on LiDar technology? 10:14
17 rights guaranteed to me under the Fifth Amendment of 10:11	17 A On the advice and direction of my counsel, I 10:14
18 the Constitution of the United States. 10:11	18 respectfully decline to answer. And I assert the 10:14
19 Q Have you deleted any communications with 10:11	19 rights guaranteed to me under the Fifth Amendment of 10:14
20 former Google employees instructing them to take 10:11	20 the Constitution of the United States. 10:14
21 confidential information from Google? 10:11	21 Q Isn't it true that, since you have been 10:14
22 A On the advice and direction of my counsel, I 10:11	22 working at Uber, you have done work regarding LiDar 10:14
23 respectfully decline to answer. And I assert the 10:11	23 technology? 10:14
24 rights guaranteed to me under the Fifth Amendment of 10:11	24 A On the advice and direction of my counsel, I 10:14
25 the Constitution of the United States. 10:12	25 respectfully decline to answer. And I assert the 10:14
Page 50	Page 52
1 0 77 1 10 10	
1 Q While you were at Google, you were issued a 10:12	1 rights guaranteed to me under the Fifth Amendment of 10:14
2 laptop computer that ran the Windows operating system; 10:12	1 rights guaranteed to me under the Fifth Amendment of 10:14 2 the Constitution of the United States. 10:14
2 laptop computer that ran the Windows operating system; 10:12	2 the Constitution of the United States. 10:14
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12 17 A On the advice and direction of my counsel, I 10:13	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15 17 A On the advice and direction of my counsel, I 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12 17 A On the advice and direction of my counsel, I 10:13 18 respectfully decline to answer. And I assert the 10:13	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15 17 A On the advice and direction of my counsel, I 10:15 18 respectfully decline to answer. And I assert the 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12 17 A On the advice and direction of my counsel, I 10:13 18 respectfully decline to answer. And I assert the 10:13 19 rights guaranteed to me under the Fifth Amendment of 10:13	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15 17 A On the advice and direction of my counsel, I 10:15 18 respectfully decline to answer. And I assert the 10:15 19 rights guaranteed to me under the Fifth Amendment of 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12 17 A On the advice and direction of my counsel, I 10:13 18 respectfully decline to answer. And I assert the 10:13 19 rights guaranteed to me under the Fifth Amendment of 10:13 20 the Constitution of the United States. 10:13	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15 17 A On the advice and direction of my counsel, I 10:15 18 respectfully decline to answer. And I assert the 10:15 19 rights guaranteed to me under the Fifth Amendment of 10:15 20 the Constitution of the United States. 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12 17 A On the advice and direction of my counsel, I 10:13 18 respectfully decline to answer. And I assert the 10:13 19 rights guaranteed to me under the Fifth Amendment of 10:13 10 the Constitution of the United States. 10:13 10 the Constitution of the United States. 10:13	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15 17 A On the advice and direction of my counsel, I 10:15 18 respectfully decline to answer. And I assert the 10:15 19 rights guaranteed to me under the Fifth Amendment of 10:15 20 the Constitution of the United States. 10:15
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12 17 A On the advice and direction of my counsel, I 10:13 18 respectfully decline to answer. And I assert the 10:13 19 rights guaranteed to me under the Fifth Amendment of 10:13 20 the Constitution of the United States. 10:13 21 Q Before you left Google, you downloaded 10:13 22 documents onto that laptop for use at Uber; correct? 10:13	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15 17 A On the advice and direction of my counsel, I 10:15 18 respectfully decline to answer. And I assert the 10:15 19 rights guaranteed to me under the Fifth Amendment of 10:15 20 the Constitution of the United States. 10:15 21 Q Isn't it true that, even today, you continue 10:15 22 to use the confidential information in 10:15 23 14,000 documents you took from Google in your 10:15 24 contributions to the design and development of LiDar 10:16
2 laptop computer that ran the Windows operating system; 10:12 3 correct? 10:12 4 A On the advice and direction of my counsel, I 10:12 5 respectfully decline to answer. And I assert the 10:12 6 rights guaranteed to me under the Fifth Amendment of 10:12 7 the Constitution of the United States. 10:12 8 Q Before you left Google, you downloaded 10:12 9 documents onto that laptop computer for use when you 10:12 10 left Google; correct? 10:12 11 A On the advice and direction of my counsel, I 10:12 12 respectfully decline to answer. And I assert the 10:12 13 rights guaranteed to me under the Fifth Amendment of 10:12 14 the Constitution of the United States. 10:12 15 Q Before you left Google, you downloaded 10:12 16 documents onto that laptop for use at Otto; correct? 10:12 17 A On the advice and direction of my counsel, I 10:13 18 respectfully decline to answer. And I assert the 10:13 19 rights guaranteed to me under the Fifth Amendment of 10:13 20 the Constitution of the United States. 10:13 21 Q Before you left Google, you downloaded 10:13 22 documents onto that laptop for use at Uber; correct? 10:13 23 A On the advice of my counsel, I respectfully 10:13	2 the Constitution of the United States. 10:14 3 Q Isn't it true that, during your work at Uber, 10:14 4 you have contributed to the design and development of 10:15 5 LiDar technology? 10:15 6 A On the advice and direction of my excuse 10:15 7 me. 10:15 8 On the advice and direction of counsel of 10:15 9 my counsel, I respectfully decline to answer. And I 10:15 10 assert the rights guaranteed to me under the Fifth 10:15 11 Amendment of the Constitution of the United States 10:15 12 Q Isn't it true that, during your work at Uber, 10:15 13 you have contributed to the design and development of 10:15 14 LiDar technology using confidential information in the 10:15 15 14,000 documents that you took from Google before you 10:15 16 left Google? 10:15 17 A On the advice and direction of my counsel, I 10:15 18 respectfully decline to answer. And I assert the 10:15 19 rights guaranteed to me under the Fifth Amendment of 10:15 20 the Constitution of the United States. 10:15 21 Q Isn't it true that, even today, you continue 10:15 22 to use the confidential information in 10:15 23 14,000 documents you took from Google in your 10:15

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 16 of 48 ATTORNEYS EYES ONLY

1 A On the advice and direction of my counsel, I 10:16	1 2015? 10:18
2 respectfully decline to answer. And I assert the 10:16	2 A On the advice and direction of my counsel, I 10:18
3 rights guaranteed to me under the Fifth Amendment of 10:16	3 respectfully decline to answer. And I assert the 10:18
4 the Constitution of the United States. 10:16	4 rights guaranteed to me under the Fifth Amendment of 10:18
5 Q Between March 2nd, 2015, and March 25th, 10:16	5 the Constitution of the United States. 10:19
6 2015, your Google-issued laptop did not perform 10:16	6 Q You caused your Google-issued laptop to 10:19
7 regular check-ins to Google's network; correct? 10:16	7 access the corporate the Google corporate network 10:19
8 MS. RAY: Objection; form. 10:16	8 for unauthorized purposes on November 25th, 2015 10:19
9 MR. EHRLICH: Let me read the question. 10:16	9 A Is that a question? 10:19
10 You can answer. 10:16	10 Q correct? 10:19
11 THE WITNESS: On the advice and direction of 10:16	11 A Okay. 10:19
12 my counsel, I respectfully decline to answer. And I 10:16	On the advice and direction of my counsel, I 10:19
13 assert the rights guaranteed to me under the Fifth 10:16	13 respectfully decline to answer. And I assert the 10:19
14 Amendment of the Constitution of the United States. 10:16	14 rights guaranteed to me under the Fifth Amendment of 10:19
15 MR. PERLSON: Q. Between March 2nd and 10:16	15 the Constitution of the United States. 10:19
16 2 2 between March 2nd, 2015, and November 25th, 10:17	16 Q On on November 26th, 2015, you then 10:19
17 2015, the network interfaces of your Google-issued 10:17	17 reinstalled the Windows operating system on your 10:19
18 laptop made only three appearances on Google's 10:17	18 Google-issued laptop; correct? 10:19
19 corporate logs? 10:17	19 A On the advice and direction of my counsel, I 10:19
20 MS. RAY: Objection; form. 10:17	20 respectfully decline to answer. And I assert the 10:19
21 THE WITNESS: Is there a question? 10:17	21 rights guaranteed to me under the Fifth Amendment of 10:19
22 MR. EHRLICH: Did did you hear the 10:17	22 the Constitution of the United States. 10:19
23 question? 10:17	23 Q You reinstalled the Windows operating system 10:19
24 MR. PERLSON: I'll let me just ask it 10:17	24 on November 26, 2015, in an effort to conceal the fact 10:20
25 again. 10:17	25 that you had been accessing Google's corporate 10:20
Page 54	Page 56
1 MR. EHRLICH: Okay. 10:17	1 network; correct? 10:20
1 MR. EHRLICH: Okay. 10:17 2 MR. PERLSON: Q. Do you have any reason to 10:17	1 network; correct? 10:20 2 A On the advice and direction of my counsel, I 10:20
, , , , , , , , , , , , , , , , , , , ,	·
2 MR. PERLSON: Q. Do you have any reason to 10:17	2 A On the advice and direction of my counsel, I 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18 18 October 22nd, 2015? 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20 19 Q On December 3rd, 2015, you ran a search for 10:20
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18 18 October 22nd, 2015? 10:18 19 A On the direction of my counsel, I 10:18 20 respectfully decline to answer. And I assert the 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20 19 Q On December 3rd, 2015, you ran a search for 10:20 20 the string CHAUFFEUR SVN EEE SETUP; correct? 10:21
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18 18 October 22nd, 2015? 10:18 19 A On the direction of my counsel, I 10:18 20 respectfully decline to answer. And I assert the 10:18 21 rights guaranteed to me under the Fifth Amendment of 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20 19 Q On December 3rd, 2015, you ran a search for 10:20 20 the string CHAUFFEUR SVN EEE SETUP; correct? 10:21 21 MR. EHRLICH: EEE SETUP? 10:21
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18 18 October 22nd, 2015? 10:18 19 A On the direction of my counsel, I 10:18 20 respectfully decline to answer. And I assert the 10:18 21 rights guaranteed to me under the Fifth Amendment of 10:18 22 the Constitution of the United States. 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20 19 Q On December 3rd, 2015, you ran a search for 10:20 20 the string CHAUFFEUR SVN EEE SETUP; correct? 10:21 21 MR. EHRLICH: EEE SETUP? 10:21 22 MR. PERLSON: Yeah. 10:21
MR. PERLSON: Q. Do you have any reason to 10:17 dispute that, between March 15th let me start over 10:17 again. 10:17 Between scratch that. 10:17 Do you have any reason to to dispute that 10:17 between March 2nd, 2015, and November 25th, 2015, that 10:17 the network interfaces of your Google-issued laptop 10:17 made only three appearances on Goo Google's 10:17 acorporate network log? 10:18 A On the advice and direction of my counsel, I 10:18 respectfully decline to answer. And I assert the 10:18 rights guaranteed to me under the Fifth Amendment of 10:18 the Constitution of the United States. 10:18 A Or the Google corporate network for 10:18 coccess Goo the Google corporate network for 10:18 coccess Goo the Google corporate network for 10:18 A On the direction of my counsel, I 10:18 A On the direction of my counsel, I 10:18 respectfully decline to answer. And I assert the 10:18 A On the direction of my counsel, I 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18 respectfully decline to answer. And I assert the 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20 19 Q On December 3rd, 2015, you ran a search for 10:20 20 the string CHAUFFEUR SVN EEE SETUP; correct? 10:21 21 MR. EHRLICH: EEE SETUP? 10:21 22 MR. PERLSON: Yeah. 10:21 23 THE WITNESS: On the advice and direction of 10:21
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18 18 October 22nd, 2015? 10:18 19 A On the direction of my counsel, I 10:18 20 respectfully decline to answer. And I assert the 10:18 21 rights guaranteed to me under the Fifth Amendment of 10:18 22 the Constitution of the United States. 10:18 23 Q You caused your Google-issued laptop to 10:18 24 access the Google corporate network for unauthorized 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20 19 Q On December 3rd, 2015, you ran a search for 10:20 20 the string CHAUFFEUR SVN EEE SETUP; correct? 10:21 21 MR. EHRLICH: EEE SETUP? 10:21 22 MR. PERLSON: Yeah. 10:21 23 THE WITNESS: On the advice and direction of 10:21 24 my counsel, I respectfully decline to answer. And I 10:21
2 MR. PERLSON: Q. Do you have any reason to 10:17 3 dispute that, between March 15th let me start over 10:17 4 again. 10:17 5 Between scratch that. 10:17 6 Do you have any reason to to dispute that 10:17 7 between March 2nd, 2015, and November 25th, 2015, that 10:17 8 the network interfaces of your Google-issued laptop 10:17 9 made only three appearances on Goo Google's 10:17 10 corporate network log? 10:18 11 A On the advice and direction of my counsel, I 10:18 12 respectfully decline to answer. And I assert the 10:18 13 rights guaranteed to me under the Fifth Amendment of 10:18 14 the Constitution of the United States. 10:18 15 Q You caused your Google-issued laptop to 10:18 16 access Goo the Google corporate network for 10:18 17 unauthorized purposes for approximately two hours on 10:18 18 October 22nd, 2015? 10:18 20 respectfully decline to answer. And I assert the 10:18 21 rights guaranteed to me under the Fifth Amendment of 10:18 22 the Constitution of the United States. 10:18	2 A On the advice and direction of my counsel, I 10:20 3 respectfully decline to answer. And I assert the 10:20 4 rights guaranteed to me under the Fifth Amendment of 10:20 5 the Constitution of the United States. 10:20 6 Q On December 3rd, 2015, you ran keyword 10:20 7 searches across the Google network from your 10:20 8 Google-issued laptop; correct? 10:20 9 A On the advice and direction of my counsel, I 10:20 10 respectfully decline to answer. And I assert the 10:20 11 rights guaranteed to me under the Fifth Amendment of 10:20 12 the Constitution of the United States. 10:20 13 Q On December 3rd, 2015, you ran a search for 10:20 14 the strings CHAUFFEUR SVN LOGIN; correct? 10:20 15 A On the advice and direction of my counsel, I 10:20 16 respectfully decline to answer. And I assert the 10:20 17 rights guaranteed to me under the Fifth Amendment of 10:20 18 the Constitution of the United States. 10:20 19 Q On December 3rd, 2015, you ran a search for 10:20 20 the string CHAUFFEUR SVN EEE SETUP; correct? 10:21 21 MR. EHRLICH: EEE SETUP? 10:21 22 MR. PERLSON: Yeah. 10:21 23 THE WITNESS: On the advice and direction of 10:21

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 17 of 48 ATTORNEYS EYES ONLY

1 MR. PERLSON: On December 10:21	
1	1 Q On December 11, 2015, you downloaded software 10:36
2 THE WITNESS: the rights guaranteed to 10:21	2 to your Google-issued laptop that would allow you to 10:36
3 MR. EHRLICH: Go ahead and finish. 10:21	3 access files on the SVN repository; correct? 10:36
4 THE WITNESS: Yeah. 10:21	4 A On the advice and direction of my counsel, I 10:36
5 And I assert the rights guaranteed to me 10:21	5 respectfully decline to answer. And I assert the 10:36
6 under the Fifth Amendment of the Constitution of the 10:21	6 rights guaranteed to me under the Fifth Amendment of 10:36
7 United States. 10:21	7 the Constitution of the United States. 10:36
8 THE VIDEOGRAPHER: I need to take a break. 10:21	8 Q On December 11, 2015, you downloaded software 10:36
9 MR. PERLSON: Okay. You need to take a 10:21	9 called Tortoise SVN; correct? 10:36
10 break? 10:21	10 A On the advice and direction of my counsel, I 10:37
THE VIDEOGRAPHER: Going off the record. The 10:21	11 respectfully decline to answer. And I assert the 10:37
12 time is 10:21. 10:21	12 rights guaranteed to me under the Fifth Amendment of 10:37
13 (Recess taken.) 10:21	13 the Constitution of the United States. 10:37
14 THE VIDEOGRAPHER: This marks the beginning 10:25	14 Q On December 11th, 2015, after you downloaded 10:37
15 of DVD No. 2 in the deposition of Anthony Levandowski. 10:34	15 Tortoise SVN, you then downloaded approximately 10:37
We are going back on the record. The time is 10:34	16 14,000 files from the SVN repository; correct? 10:37
17 10:34. 10:34	17 A On the advice and direction of my counsel, I 10:37
MR. PERLSON: Q. The searches that you ran 10:34	18 respectfully decline to answer. And I assert the 10:37
19 on December 3rd, 2015, were run to locate files 10:35	19 rights guaranteed to me under the Fifth Amendment of 10:37
20 relating to Google's self-driving car project at that 10:35	20 the Constitution of the United States. 10:37
21 time; correct? 10:35	21 Q The files you downloaded from the SVN 10:37
22 A On the advice and direction of my counsel, I 10:35	22 repository on December 11, 2015, totaled 9.7 gigabytes 10:37
23 respectfully decline to answer. And I assert the 10:35	23 of data; correct? 10:37
24 rights guaranteed to me under the Fifth Amendment of 10:35	24 A On the advice and direction of my counsel, I 10:37
25 the Constitution of the United States. 10:35 Page 58	25 respectfully decline to answer. And I assert the 10:37 Page 60
1 Q SVN is the name of the document repository 10:35	1 rights guaranteed to me under the Fifth Amendment of 10:37
2 containing Waymo's design files, schematics, and other 10:35	2 the Constitution of the United States. 10:37
3 confidential information relating to the self-driving 10:35	3 Q The files downloaded from the SVN repository 10:37
4 car project; correct? 10:35	4 on December 11, 2015, included approximately 10:37
5 A On the advice and direction of my counsel, I 10:35	5 2 gigabytes of data from LiDar subdirectories; 10:37
	l
6 respectfully decline to answer. And I assert the 10:35	6 correct? 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35	7 A On the advice and direction of my counsel, I 10:39
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38 18 the Constitution of the United States. 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36 19 Q The searches you ran across the Google 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38 18 the Constitution of the United States. 10:38 19 Q You downloaded approximately 14,000 files 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36 19 Q The searches you ran across the Google 10:36 20 network on December 3rd, 2015, were made without 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38 18 the Constitution of the United States. 10:38 19 Q You downloaded approximately 14,000 files 10:38 20 from Google's SVN repository without authorization 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36 19 Q The searches you ran across the Google 10:36 20 network on December 3rd, 2015, were made without 10:36 21 authorization from Google; correct? 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38 18 the Constitution of the United States. 10:38 19 Q You downloaded approximately 14,000 files 10:38 20 from Google's SVN repository without authorization 10:38 21 from Google; correct? 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36 19 Q The searches you ran across the Google 10:36 20 network on December 3rd, 2015, were made without 10:36 21 authorization from Google; correct? 10:36 22 A On the advice and direction of my counsel, I 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38 18 the Constitution of the United States. 10:38 19 Q You downloaded approximately 14,000 files 10:38 20 from Google's SVN repository without authorization 10:38 21 from Google; correct? 10:38 22 A On the advice and direction of my counsel, I 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36 19 Q The searches you ran across the Google 10:36 20 network on December 3rd, 2015, were made without 10:36 21 authorization from Google; correct? 10:36 22 A On the advice and direction of my counsel, I 10:36 23 respectfully decline to answer. And I assert the 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38 18 the Constitution of the United States. 10:38 19 Q You downloaded approximately 14,000 files 10:38 20 from Google's SVN repository without authorization 10:38 21 from Google; correct? 10:38 22 A On the advice and direction of my counsel, I 10:38 23 respectfully decline to answer. And I assert the 10:38
7 rights guaranteed to me under the Fifth Amendment 10:35 8 rights under the Fifth Amendment of the 10:35 9 Constitution of the United States. 10:35 10 Q The searches you ran across the Google 10:35 11 network on December 3rd, 2013, were not related to any 10:35 12 legitimate duties you were performing for Google at 10:36 13 that time? 10:36 14 A On the advice and direction of my counsel, I 10:36 15 respectfully disagree I respectfully decline to 10:36 16 answer. And I assert the rights guaranteed to me 10:36 17 under the Fifth Amendment of the Constitution of the 10:36 18 United States. 10:36 19 Q The searches you ran across the Google 10:36 20 network on December 3rd, 2015, were made without 10:36 21 authorization from Google; correct? 10:36 22 A On the advice and direction of my counsel, I 10:36 23 respectfully decline to answer. And I assert the 10:36 24 rights guaranteed to me under the Fifth Amendment of 10:36	7 A On the advice and direction of my counsel, I 10:39 8 respectfully decline to answer. And I assert the 10:39 9 rights guaranteed to me under the Fifth Amendment of 10:39 10 the Constitution of the United States. 10:39 11 Q The approximately 14,000 files you downloaded 10:38 12 from Google's SVN repository on December 11, 2015, was 10:38 13 not related to any legitimate work by you in your role 10:38 14 as a Google Waymo employee; correct? 10:38 15 A On the advice and direction of my counsel, I 10:38 16 respectfully decline to answer. And I assert the 10:38 17 rights guaranteed to me under the Fifth Amendment of 10:38 18 the Constitution of the United States. 10:38 19 Q You downloaded approximately 14,000 files 10:38 20 from Google's SVN repository without authorization 10:38 21 from Google; correct? 10:38 22 A On the advice and direction of my counsel, I 10:38 23 respectfully decline to answer. And I assert the 10:38 24 rights guaranteed to me under the Fifth Amendment of 10:38

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 18 of 48 ATTORNEYS EYES ONLY

1 Q On December 11th, 2015, you downloaded 10:38	1 A On the advice and direction of my counsel, I 10:41
2 approximately 14,000 files from Google's SVN 10:38	2 respectfully decline to answer. And I assert the 10:41
3 repository so that you could use them for the new 10:38	3 rights guaranteed to me under the Fifth Amendment of 10:41
4 company you were founding; correct? 10:39	4 the Constitution of the United States. 10:41
5 A On the advice and direction of my counsel, I 10:39	5 Q On December 14, 2015, you copied 10:41
6 respectfully decline to answer. And I assert the 10:39	6 approximately 14,000 confidential Google files to an 10:41
7 rights guaranteed to me under the Fifth Amendment of 10:39	7 external storage device so that you could use them to 10:41
8 the Constitution of the United States. 10:39	8 compete with Google; correct? 10:41
9 Q You downloaded approximately 14,000 files on 10:39	9 A On the advice and direction of my counsel, I 10:41
10 December 11, 2015, from Google's SVN repository so 10:39	10 respectfully decline to answer. And I assert the 10:41
11 that you could use them to compete with Google; 10:39	11 rights guaranteed to me under the Fifth Amendment of 10:41
12 correct? 10:39	12 the Constitution of the United States. 10:41
13 A On the advice and direction of my counsel, I 10:39	13 Q On December 18, 2015, you reformatted the 10:41
14 respectfully decline to answer. And I assert the 10:39	14 Windows operating system on your Google-issued laptop 10:41
15 rights guaranteed to me under the Fifth Amendment of 10:39	15 to a Linux operating system; correct? 10:41
16 the Constitution of the United States. 10:39	16 A On the advice and direction of my counsel, I 10:41
17 Q On December 14, 2015, you attached to your 10:39	17 respectfully decline to answer. And I assert the 10:41
18 Google-issued laptop a Transcend RDF 45 USB 3.0 Card 10:39	18 rights guaranteed to me under the Fifth Amendment of 10:41
19 Reader; correct? 10:39	19 the Uni of the Constitution of the United States. 10:41
20 A On the advice and direction of my counsel, I 10:40	20 Q On December 18, 2015, you reformatted the 10:41
21 respectfully decline to answer. And I assert the 10:40	21 operating system on your Google-issued laptop because 10:42
22 rights guaranteed to me under the Fifth Amendment of 10:40	22 you thought this would conceal the fact that you had 10:42
23 the Constitution of the United States. 10:40	23 downloaded and copied 14,000 confidential Google files 10:42
24 Q On December 14, 2015, you attached an 10:40	24 from the SVN server; correct? 10:42
25 external storage device to your Google-issued laptop 10:40	25 A On the advice and direction of my counsel, I 10:42
Page 62	Page 64
1 for approximately sight 1	
1 for approximately eight hours; correct? 10:40	1 respectfully decline to answer. And I assert the 10:42
1 for approximately eight hours; correct? 10:40 2 A On the advice and direction of my counsel, I 10:40	1 respectfully decline to answer. And I assert the 10:42 2 rights guaranteed to me under the Fifth Amendment of 10:42
2 A On the advice and direction of my counsel, I 10:40	-
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42
2 A On the advice and direction of my counsel, I 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40 18 A On the advice and direction of my counsel, I 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42 18 called "PBR Intensity Calibration" from Google's 10:42
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40 18 A On the advice and direction of my counsel, I 10:40 19 respectfully decline to answer. And I assert the 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42 18 called "PBR Intensity Calibration" from Google's 10:43
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40 18 A On the advice and direction of my counsel, I 10:40 19 respectfully decline to answer. And I assert the 10:40 20 rights guaranteed to me under the Fifth Amendment of 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42 18 called "PBR Intensity Calibration" from Google's 10:43 20 A On the advice and direction of my counsel, I 10:43
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40 18 A On the advice and direction of my counsel, I 10:40 19 respectfully decline to answer. And I assert the 10:40 20 rights guaranteed to me under the Fifth Amendment of 10:40 21 the Constitution of the United States. 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42 18 called "PBR Intensity Calibration" from Google's 10:43 19 internal drive database; correct? 10:43 20 A On the advice and direction of my counsel, I 10:43 21 respectfully decline to answer. And I assert the 10:43
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40 18 A On the advice and direction of my counsel, I 10:40 19 respectfully decline to answer. And I assert the 10:40 20 rights guaranteed to me under the Fifth Amendment of 10:40 21 the Constitution of the United States. 10:40 22 Q On December 14th, 2015, you copied 14 10:40	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42 18 called "PBR Intensity Calibration" from Google's 10:42 19 internal drive database; correct? 10:43 20 A On the advice and direction of my counsel, I 10:43 21 respectfully decline to answer. And I assert the 10:43 22 rights guaranteed to me under the Fifth Amendment of 10:43
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40 18 A On the advice and direction of my counsel, I 10:40 19 respectfully decline to answer. And I assert the 10:40 20 rights guaranteed to me under the Fifth Amendment of 10:40 21 the Constitution of the United States. 10:40 22 Q On December 14th, 2015, you copied 14 10:40 23 approximately 14,000 confidential Google files to an 10:41	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42 18 called "PBR Intensity Calibration" from Google's 10:43 20 A On the advice and direction of my counsel, I 10:43 21 respectfully decline to answer. And I assert the 10:43 22 rights guaranteed to me under the Fifth Amendment of 10:43 23 the Constitution of the United States. 10:43 24 Q On January 3rd, 2016, you exported a file 10:43
2 A On the advice and direction of my counsel, I 10:40 3 respectfully decline to answer. And I assert the 10:40 4 rights guaranteed to me under the Fifth Amendment of 10:40 5 the Constitution of the United States. 10:40 6 Q On December 14, 2015, you copied 10:40 7 approximately 14,000 confidential Google files which 10:40 8 you had previously downloaded from the SVN server to 10:40 9 an external storage device; correct? 10:40 10 A On the advice and direction of my counsel, I 10:40 11 respectfully decline to answer. And I assert the 10:40 12 rights guaranteed to me under the Fifth Amendment of 10:40 13 the Constitution of the United States. 10:40 14 Q On December 14th, 2015, you copied 10:40 15 approximately 14,000 confidential Google files to an 10:40 16 external storage device without authorization from 10:40 17 Google; correct? 10:40 18 A On the advice and direction of my counsel, I 10:40 19 respectfully decline to answer. And I assert the 10:40 20 rights guaranteed to me under the Fifth Amendment of 10:40 21 the Constitution of the United States. 10:40 22 Q On December 14th, 2015, you copied 14 10:40 23 approximately 14,000 confidential Google files to an 10:41 24 external storage device so you could use them for the 10:41	2 rights guaranteed to me under the Fifth Amendment of 10:42 3 the Constitution of the United States. 10:42 4 Q You had access to Google's internal drive 10:42 5 database while you were a Google employee; correct? 10:42 6 A On the advice and direction of my counsel, I 10:42 7 respectfully decline to answer. And I assert my 10:42 8 rights guaranteed to me under the Fifth Amendment of 10:42 9 the Constitution of the United States. 10:42 10 Q On January 3rd, 2016, you exported five 10:42 11 five files from Google Drive's database to a personal 10:42 12 device; correct? 10:42 13 A On the advice and direction of my counsel, I 10:42 14 respectfully decline to answer. And I assert the 10:42 15 rights guaranteed to me under the Fifth Amendment of 10:42 16 the Constitution of the United States. 10:42 17 Q On January 3rd, 2016, you exported a file 10:42 18 called "PBR Intensity Calibration" from Google's 10:43 20 A On the advice and direction of my counsel, I 10:43 21 respectfully decline to answer. And I assert the 10:43 22 rights guaranteed to me under the Fifth Amendment of 10:43 23 the Constitution of the United States. 10:43 24 Q On January 3rd, 2016, you exported a file 10:43

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 19 of 48 ATTORNEYS EYES ONLY

9 Google's internal drive database; correct? 10:43 10 A On the advice and direction of my counsel, I 10:43 11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 Tights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 27 respectfully decline to answer. And I assert the 10:44 28 using Google's comfidential information; correct? 10:45 30 A On the advice and direction of my counsel, I 10:44 41 the Constitution of the United States. 10:44 42 the Constitution of the United States. 10:44 43 rights guaranteed to me under the Fifth Amendment of 10:44 44 the Constitution of the United States. 10:44 45 Q The 14-1000 files that you exported to an 10:44 46 the Constitution of the United States. 10:45 47 so that you could use them to compete with Google by 10:45 48 using Google's confidential information; correct? 10:45 49 A On the advice and direction of my counsel, I 10:45 40 the Constitution of the United States. 10:48 41 ti twrong. 10:48 42 respectfully decline to answer. And I assert the 10:48 43 rights guaranteed to me under the Fifth Amendment of 10:45 44 the Constitution of the United States. 10:48 45 phase p	A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 ights guaranteed to me under the Fifth Amendment of 10:43 he Constitution of the United States. 10:43 Q On January 3rd, 2016, you also exported files 10:43 called "TX and RX Tuning Instructions," "GBR Assembly 10:43 Flowchart SOP," and "TBR Testing Station" from 10:43 A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 he Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 espectfully decline to answer. And I assert the 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 espectfully decline to answer. And I assert the 10:44 fights guaranteed to me under the Fifth Amendment of 10:44 he Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 ever exported so that you could use them to compete 10:44 ever exported so that you could use them to compete 10:44	2 Q On January 11, 2016, you exported a file from 10:46 3 Google's internal drive database so that you could use 10:46 4 it to support the new company you were founding 10:46 5 founding; correct? 10:46 6 A On the advice and direction of my counsel, I 10:46 7 respectfully decline to answer. And I assert the 10:46 8 rights guaranteed to me under the Fifth Amendment of 10:46 9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
3 respectfully decline to answer. And I assert the 10:43 4 rights guaranteed to me under the Fifth Amendment of 10:43 5 the Constitution of the United States. 10:43 6 Q On January 3rd, 2016, you also exported files 10:43 7 called "TX and RX Tuning Instructions," "GIBR Assembly 10:43 9 Google's internal drive database," correct? 10:43 10 A On the advice and direction of my counsel, I 10:43 11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 decline to answer. And I assert the 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, were 10:44 24 were exported on the under the Fifth Amendment of 10:44 25 with Google; correct? 10:45 26 with Google; correct? 10:45 27 so that you could use them to compete with Google by 10:45 28 using Google's confidential information; correct? 10:45 29 A On the advice and direction of my counsel, I 10:45 30 the Page 66 4 A On the advice and mirection of my counsel, I 10:49 4 the Constitution of the United States. 10:49 4 the Constitution of the United States. 10:49 5 vith Google; correct? 10:45 6 external device database on January 3rd, 2016, 10:45 14 the Constitution of the United States. 10:48 15 Q The Five files that you exported to an 10:44 16 external device and direction of my counsel, I 10:45 16 A On the advice and direction of my counsel, I 10:45 17 the Constitution of the United States. 10:49 18 a fights guaranteed to me under the Fifth Amendment of 10:45 19 from Google computers, before departing Google, to 10:48 10 ri	ights guaranteed to me under the Fifth Amendment of 10:43 he Constitution of the United States. 10:43 Q On January 3rd, 2016, you also exported files 10:43 called "TX and RX Tuning Instructions," "GBR Assembly 10:43 Flowchart SOP," and "TBR Testing Station" from 10:43 Google's internal drive database; correct? 10:43 A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 ights guaranteed to me under the Fifth Amendment of 10:43 he Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 exported so that you could use them to support the new 10:44 exported so that you could use them to support the new 10:44 exported so that you could use them to support the new 10:44 exported so that you could use them to support the new 10:44 exported so that you could use them to support the new 10:44 exported so that you could use them to support the new 10:44 exported so that you could use them to support the new 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expectfully decline to answer. And I assert the 10:44 expected to the united States. 10:44 expected to the united States 10:	3 Google's internal drive database so that you could use 10:46 4 it to support the new company you were founding 10:46 5 founding; correct? 10:46 6 A On the advice and direction of my counsel, I 10:46 7 respectfully decline to answer. And I assert the 10:46 8 rights guaranteed to me under the Fifth Amendment of 10:46 9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
4 rights guaranteed to me under the Fifth Amendment of 10.43 5 the Constitution of the United States. 10.43 7 called "TX and RX Tuning Instructions," "GBR Assembly 10.43 8 Flowchart SOP," and "TBR Testing Station" from 10.43 9 Google's internal drive database; correct? 10.43 10 A On the advice and direction of my counsel, 1 10.43 11 respectfully decline to answer. And I assert the 10.43 12 rights guaranteed to me under the Fifth Amendment of 10.44 14 Q The five files you exported from Google's 10.44 15 internal drive database on January 3rd, 2016, were 10.44 16 exported so that you could use them to support the new 10.44 17 company you were founding? 10.44 18 A On the advice and direction of my counsel, 1 10.44 19 respectfully decline to answer. And I assert the 10.44 20 rights guaranteed to me under the Fifth Amendment of 10.44 21 the Constitution of the United States. 10.44 22 Q The five files that you could use them to compete 10.44 23 Google's internal drive database on January 3rd, 2016, 10.44 24 were exported so that you could use them to compete 10.44 25 with Google' correct? 10.45 3 rights guaranteed to me under the Fifth Amendment of 10.44 4 the Constitution of the United States. 10.44 5 Q The five files that you exported from 10.44 6 external drive database on January 3rd, 2016, 10.44 26 external drive database on January 3rd, 2016, 10.44 27 or pights guaranteed to me under the Fifth Amendment of 10.44 28 were exported so that you could use them to compete 10.44 29 Q The five files that you exported from 10.44 20 rights guaranteed to me under the Fifth Amendment of 10.44 21 the Constitution of the United States. 10.44 22 Q The five database on January 3rd, 2016, 10.44 23 rights guaranteed to me under the Fifth Amendment of 10.44 24 were exported so that you could use them to compete 10.44 25 with Google's correct? 10.45 30 rights guaranteed to me under the Fifth Amendment of 10.44 41 the Constitution of the United States. 10.44 42 respectfully decline to answer. And I assert the 10.45 43 rights guaran	ights guaranteed to me under the Fifth Amendment of 10:43 the Constitution of the United States. 10:43 Q On January 3rd, 2016, you also exported files 10:43 called "TX and RX Tuning Instructions," "GBR Assembly 10:43 Flowchart SOP," and "TBR Testing Station" from 10:43 Google's internal drive database; correct? 10:43 A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 ights guaranteed to me under the Fifth Amendment of 10:43 the Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 espectfully decline to answer. And I assert the 10:44 espectfully decline to answer. And I assert the 10:44 Company you were founding? 10:44 The Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 ever exported so that you could use them to compete 10:44 ever exported so that you could use them to compete 10:44	4 it to support the new company you were founding 10:46 5 founding; correct? 10:46 6 A On the advice and direction of my counsel, I 10:46 7 respectfully decline to answer. And I assert the 10:46 8 rights guaranteed to me under the Fifth Amendment of 10:46 9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
5 fine Constitution of the United States. 10:43 6 Q On January 3rd, 2016, you also exported files 10:43 7 called "TX and RX Tuning Instructions," 'Called Assembly 10:43 8 Flowchart SOP," and "TBR Testing Station" from 10:43 9 Google's internal drive databases; correct? 10:43 11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to compete 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 21 Q The five files that you exported from 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 the Constitution of the United States. 10:44 27 company to weer founding? 10:44 28 were exported so that you could use them to compete 10:44 29 Or The five files that you exported from 10:44 31 rights guaranteed to me under the Fifth Amendment of 10:44 41 the Constitution of the United States. 10:48 42 were exported so that you could use them to compete 10:44 43 respectfully decline to answer. And I assert the 10:44 44 the Constitution of the United States. 10:48 45 Q The 14:000 files that you exported to an 10:44 46 external device on December 14th, 2015, were exported to 10:45 47 so that you could use them to compete with Google by 10:45 48 using Google's confidential information; correct? 10:45 49 A On the advice and direction of my counsel, I 10:44 50 Q The 14:000 files that you exported to an 10:44 61 external device on December 14th, 2015, were exported to an under the Fifth Amendment of 10:45 61 A On the advice and direction of my counsel, I 10:45 62 Q The five files you exported to an 10:44 64 external	the Constitution of the United States. 10:43 Q On January 3rd, 2016, you also exported files 10:43 called "TX and RX Tuning Instructions," "GBR Assembly 10:43 Flowchart SOP," and "TBR Testing Station" from 10:43 Google's internal drive database; correct? 10:43 A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 the Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 espectfully decline to answer. And I assert the 10:44 company you were founding? 10:44 Constitution of the United States. 10:44 Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 Google's internal drive database on January 3rd, 2016, 10:44 Every exported so that you could use them to compete 10:44 Every exported so that you could use them to compete 10:44	5 founding; correct? 10:46 6 A On the advice and direction of my counsel, I 10:46 7 respectfully decline to answer. And I assert the 10:46 8 rights guaranteed to me under the Fifth Amendment of 10:46 9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
6 A On the advice and direction of my counsel, I 10:46 7 called "TX and RX Tuning Instructions," "GBR Assembly 10:43 8 Flowchard SDP," and "TBR Testing Station" from 10:43 9 Google's internal drive databases; correct? 10:43 10 A On the advice and direction of my counsel, I 10:43 11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, loe-44 16 exported so that you could use them to compete with 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete with 6:00; a right squaranteed to me under the Fifth Amendment of 10:44 24 were exported so that you could use them to compete with 6:00; by 10:45 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:48 5 Q The 14:000 files that you exported from 10:44 4 the Constitution of the United States. 10:48 5 Q The 14:000 files that you exported to an 10:44 6 external device and direction of my counsel, I 10:44 6 external device and offerction of my counsel, I 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:48 13 Q The five f	Q On January 3rd, 2016, you also exported files 10:43 called "TX and RX Tuning Instructions," "GBR Assembly 10:43 Flowchart SOP," and "TBR Testing Station" from 10:43 Google's internal drive database; correct? 10:43 A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 he Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 heternal drive database on January 3rd, 2016, were 10:44 exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 heternal drive database on January 3rd, 2016, 10:44 heternal drive database on January 3rd, 2016, 10:44 Coogle's internal drive database on January 3rd, 2016, 10:44 Google's internal drive database on January 3rd, 2016, 10:44 heternal drive database on January 3rd, 2016, 10:44	6 A On the advice and direction of my counsel, I 10:46 7 respectfully decline to answer. And I assert the 10:46 8 rights guaranteed to me under the Fifth Amendment of 10:46 9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
7 called "TX and RX Tuning Instructions," "GBR Assembly 10-43 8 Flowchart SOP," and "TBR Testing Station" from 10-43 9 Google's internal drive database; correct? 10-43 10 A On the advice and direction of my counsel, I 10-43 11 respectfully decline to answer. And I assert the 10-43 12 rights guaranteed to me under the Fifth Amendment of 10-43 13 A On the advice and direction of my counsel, I 10-44 14 Q The five files you exported from Google's 10-44 15 internal drive database on January 3rd, 2016, were 10-44 16 exported so that you could use them to support the new 10-44 17 company you were founding? 10-44 18 A On the advice and direction of my counsel, I 10-44 19 respectfully decline to answer. And I assert the 10-44 20 rights guaranteed to me under the Fifth Amendment of 10-44 21 the Constitution of the United States. 10-44 22 Q The five files that you exported from 10-44 23 Google's internal drive database on January 3rd, 2016, 10-44 24 were exported so that you could use them to compete with Google by 10-45 25 with Google; correct? 10-45 26 with Google; correct? 10-45 27 so that you could use them to compete with Google by 10-45 28 using Google's confidential information; correct? 10-45 29 A On the advice and direction of my counsel, I 10-44 4 the Constitution of the United States. 10-44 5 Q The 14,000 files that you exported to an 10-44 4 the Constitution of the United States. 10-45 7 so that you could use them to compete with Google by 10-45 8 using Google's confidential information; correct? 10-45 9 A On the advice and direction of my counsel, I 10-45 11 rights guaranteed to me under the Fifth Amendment of 10-45 12 the Constitution of the United States. 10-48 13 Q The five files you exported on January 3rd, 10-45 14 (constitution of the United States) 10-48 15 rights guaranteed to me under the Fifth Amendment of 10-44 16 the Constitution of the United States. 10-48 17 Q You directed Google employees that you asked 10-47 18 A On the advice and direction of my counsel, I 10-48 19 rights guaranteed to me und	Falled "TX and RX Tuning Instructions," "GBR Assembly 10:43 Flowchart SOP," and "TBR Testing Station" from 10:43 Google's internal drive database; correct? 10:43 A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 eights guaranteed to me under the Fifth Amendment of 10:43 the Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 exported so that you could use them to support the new 10:44 exported so that you could use them to support the new 10:44 exported so that you and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 the Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 ever exported so that you could use them to compete 10:44	7 respectfully decline to answer. And I assert the 10:46 8 rights guaranteed to me under the Fifth Amendment of 10:46 9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
8 Flowchart SOP," and "TBR Testing Station" from 10:43 9 Google's internal drive database; correct? 10:43 11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:44 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 16 exported so that you could use them to compete vith Google's internal drive database on January 3rd, 2016, were 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, lo:44 24 were exported so that you could use them to compete vith 10:44 25 with Google's correct? 10:45 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:44 2 respectfully decline to answer. And I assert the 10:44 4 the Constitution of the United States. 10:44 5 Q The five files that you exported from 10:44 4 the Constitution of the United States. 10:44 5 Q The 14000 files that you exported to an 10:44 4 the Constitution of the United States. 10:44 5 Q The 14000 files that you exported to an 10:44 4 the Constitution of the United States. 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 2016. 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information; correct? 10:45 14 2016, were exported on January 3rd, 10:45 16 Robert States Stat	Flowchart SOP," and "TBR Testing Station" from 10:43 A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 ights guaranteed to me under the Fifth Amendment of 10:43 he Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 nternal drive database on January 3rd, 2016, were 10:44 exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 ights guaranteed to me under the Fifth Amendment of 10:44 he Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	8 rights guaranteed to me under the Fifth Amendment of 10:46 9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
9 Google's internal drive database; correct? 10:43 10 A On the advice and direction of my counsel, I 10:43 11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 with Google; correct? 10:44 27 company database on January 3rd, 2016, 10:44 28 using Google's confidential information; correct? 10:45 30 of the Advice and direction of my counsel, I 10:44 4 the Constitution of the United States. 10:44 4 the Constitution of the United States. 10:45 50 The 14:000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:48 13 A On the advice and direction of my counsel, I 10:44 4 the Constitution of the United States. 10:48 5 Q The five files that you exported to an 10:44 4 the Constitution of the United States. 10:48 6 external device on December 14th, 2015, were exported 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:48 13 ti twrong. 10:48 14 ti twrong. 10:48 15 fights guaranteed to me under the Fifth Amendment of 10:45 16 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me unde	A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 ights guaranteed to me under the Fifth Amendment of 10:43 the Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 exported so that you could use them to support the new 10:44 and any on the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 espectfully decline to answer. And I assert the 10:44 espectfully decline to me under the Fifth Amendment of 10:44 the Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	9 the Constitution of the United States. 10:47 10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
10 A On the advice and direction of my counsel, I 10:43 11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 27 respectfully decline to answer. And I assert the 10:44 28 respectfully decline to answer. And I assert the 10:44 29 The five files that you exported from 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:47 22 Q The five files that you could use them to compete 10:44 23 rights guaranteed to me under the Fifth Amendment of 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:45 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:47 5 or that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:47 13 to not the advice and direction of my counsel, I 10:48 14 the Constitution of the United States. 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:45 16 A On the advice and direction of my counsel, I 10:45 17 or the five	A On the advice and direction of my counsel, I 10:43 espectfully decline to answer. And I assert the 10:43 ights guaranteed to me under the Fifth Amendment of 10:43 the Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 Internal drive database on January 3rd, 2016, were 10:44 exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 the Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 evere exported so that you could use them to compete 10:44	10 Q On January 11, 2016, you exported a file from 10:47 11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
11 respectfully decline to answer. And I assert the 10:43 12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, lo:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 with Google computers, before departing Google, to 10:47 27 the Constitution of the United States. 10:48 28 rights guaranteed to me under the Fifth Amendment of 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 41 the Constitution of the United States. 10:48 42 respectfully decline to answer. And I assert the 10:44 43 the Constitution of the United States. 10:48 44 the Constitution of the United States. 10:48 45 Q The 14:000 files that you exported to an 10:44 46 the Constitution of the United States. 10:49 47 respectfully decline to answer. And I assert the 10:45 48 using Google's confidential information; correct? 10:45 40 respectfully decline to answer. And I assert the 10:45 41 rights guaranteed to me under the Fifth Amendment of 10:45 41 going with you to Otto? 10:48 42 respectfully decline to answer. And I assert the 10:44 43 rights guaranteed to me under the Fifth Amendment of 10:45 44 the Constitution of the United States. 10:49 45 respectfully decline to answer. And I assert the 10:45 46 respectfully decline to answer. And I assert the 10:45 47 respectfully decline to answer. And I assert the 10:45 48 rights guaranteed to me under the Fifth Amendment of 10:45 49 A On the advice and direc	espectfully decline to answer. And I assert the 10:43 ights guaranteed to me under the Fifth Amendment of 10:43 he Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 nternal drive database on January 3rd, 2016, were 10:44 exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 ights guaranteed to me under the Fifth Amendment of 10:44 he Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	11 Google's internal drive database so that you could use 10:47 12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q. The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A. On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q. The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google: correct? 10:45 4 the Constitution of the United States. 10:44 4 the Constitution of the United States. 10:44 5 Q. The five files you exported from 10:44 4 the Constitution of the United States. 10:44 5 Q. The five files were and direction of my counsel, I 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with 60ogle by 10:45 8 using Google's confidential information; correct? 10:45 9 A. On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q. The five files you exported on January 3rd, 10:45 14 Constitution of the United States. 10:45 15 Google by using Google's confidential information? 10:45 16 A. On the advice and direction of my counsel, I 10:45 17 cy You directed Google employees that you asked 10:47 22 the Constitution of the United States. 10:48 23 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:48 5 Q. The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported on the United States. 10:48 10 respectfully decline to answer. And I assert the 10:45 11 rights guar	ights guaranteed to me under the Fifth Amendment of 10:43 the Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 Internal drive database on January 3rd, 2016, were 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 A On the advice and direction of my counsel, I 10:44 Exported so that you can direction of my counsel, I 10:44 Exported so the direction of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 Exported so that you could use them to compete 10:44	12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
12 rights guaranteed to me under the Fifth Amendment of 10:43 13 the Constitution of the United States. 10:44 14 Q. The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A. On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q. The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google: correct? 10:45 4 the Constitution of the United States. 10:44 4 the Constitution of the United States. 10:44 5 Q. The five files you exported from 10:44 4 the Constitution of the United States. 10:44 5 Q. The five files were and direction of my counsel, I 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with 60ogle by 10:45 8 using Google's confidential information; correct? 10:45 9 A. On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q. The five files you exported on January 3rd, 10:45 14 Constitution of the United States. 10:45 15 Google by using Google's confidential information? 10:45 16 A. On the advice and direction of my counsel, I 10:45 17 cy You directed Google employees that you asked 10:47 22 the Constitution of the United States. 10:48 23 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:48 5 Q. The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported on the United States. 10:48 10 respectfully decline to answer. And I assert the 10:45 11 rights guar	ights guaranteed to me under the Fifth Amendment of 10:43 the Constitution of the United States. 10:44 Q The five files you exported from Google's 10:44 Internal drive database on January 3rd, 2016, were 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 A On the advice and direction of my counsel, I 10:44 Exported so that you can direction of my counsel, I 10:44 Exported so the direction of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 Exported so that you could use them to compete 10:44	12 it at your new company to compete with Google? 10:47 13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
13 he Constitution of the United States. 10:44 14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 21 the Constitution of the United States. 10:47 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 37 rights guaranteed to me under the Fifth Amendment of 10:44 48 the Constitution of the United States. 10:45 5 Q The 14,000 files that you exported to an 10:44 5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:45 15 Google by using Google's confidential information; correct? 10:45 16 Amendment of the Constitution of the United States. 10:44 20 bring with you to Waymo - to Outo? 10:47 21 he Constitution of the United States. 10:48 22 respectfully decline to answer. And I assert the 10:44 24 the Constitution of the United States. 10:48 25 Q Let me just ask that again, because I asked 10:48 26 via direction of my counsel, I 10:44 27 You directed Google employees that you asked 10:48 28 using Google's confidential information; correct? 10:45 29 A On the advice and direction of my counsel, I 10:45 20 C The 14,000 files that you exported to an 10:44 21 the Constitution of the United States. 10:49 21 A On the advice and direction of my counsel, I 10:45 22	A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 Of The five files that you exported from 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 Of The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 evere exported so that you could use them to compete 10:44	13 A On the advice of and and direction of my 10:47 14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
14 Q The five files you exported from Google's 10:44 15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 27 respectfully decline to answer. And I assert the 10:44 28 rights guaranteed to me under the Fifth Amendment of 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 41 the Constitution of the United States. 10:44 42 respectfully decline to answer. And I assert the 10:44 43 rights guaranteed to me under the Fifth Amendment of 10:44 44 the Constitution of the United States. 10:44 55 Q The 14,000 files that you exported to an 10:44 46 external device on December 14th, 2015, were exported 10:45 77 so that you could use them to compete with Google by 10:45 88 using Google's confidential information; correct? 10:45 90 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 gloined your new company? 10:48 13 Q The five files was exported on January 3rd, 10:45 14 Colo, were exported so that you could compete with 10:45 15 Google by using Google's confidential information? 10:45 16 A On the advice and direction of my counsel, I 10:45 17 (C) You directed Google employees that you asked 10:48 18 to join you at your new company, to export documents 10:44 22 the Constitution of the United States. 10:48 23 rights guaranteed to me under the Fifth Amendment of 10:45 31 (First Amendment of 10:45 32 (First A	Q The five files you exported from Google's 10:44 Internal drive database on January 3rd, 2016, were 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to support the new 10:44 Exported so that you could use them to compete 10:44 Exported so that you could use them to compete 10:44 Exported so that you could use them to compete 10:44 Exported so that you could use them to compete 10:44	14 counsel, I respectfully decline to answer. And I 10:47 15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
15 internal drive database on January 3rd, 2016, were 10:44 16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 27 respectfully decline to answer. And I assert the 10:44 28 respectfully decline to answer. And I assert the 10:44 29 that the Constitution of the United States. 10:48 20 The 14,000 files that you exported to an 10:44 21 the Constitution of the United States. 10:48 22 For the 14,000 files that you exported to an 10:44 23 rights guaranteed to me under the Fifth Amendment of 10:44 24 the Constitution of the United States. 10:48 25 Q The 14,000 files that you exported to an 10:44 26 external device on December 14th, 2015, were exported 10:45 3 rights guaranteed to me under the Fifth Amendment of 10:45 4 the Constitution of the United States. 10:48 5 part of the United States. 10:48 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:48 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:48 11 rights guaranteed to me under the Fifth Amendment of 10:48 11 rights guaranteed to me under the Fifth Amendment of 10:48 12 pin	exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 he Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	15 assert the rights guaranteed to me under the Fifth 10:47 16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
16 exported so that you could use them to support the new 10:44 17 company you were founding? 10:44 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 27 respectfully decline to answer. And I assert the 10:44 28 respectfully decline to answer. And I assert the 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 40 the Constitution of the United States. 10:44 41 the Constitution of the United States. 10:44 42 the Constitution of the United States. 10:44 43 rights guaranteed to me under the Fifth Amendment of 10:44 44 the Constitution of the United States. 10:44 45 Q The 14,000 files that you exported to an 10:44 46 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:48 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:45 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:48 18 to join you at your new company, to export documents 10:43 19 from Google employees that you asked 10:48 20 the Constitution of the United States. 10:48 21 tile Constitution of the United States. 10:48 22 You directed Google employees, that you asked 10:48 23 rights guaranteed to me under the Fifth Amendment of 10:45 24 from Google	exported so that you could use them to support the new 10:44 company you were founding? 10:44 A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 the Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	16 Amendment of the Constitution of the United States. 10:47 17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
17 company you were founding? 18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 27 respectfully decline to me under the Fifth Amendment of 10:44 28 respectfully decline to answer. And I assert the 10:44 39 rights guaranteed to me under the Fifth Amendment of 10:44 40 the Constitution of the United States. 10:44 41 the Constitution of the United States. 10:45 42 of the advice and direction of my counsel, I 10:44 43 the Constitution of the United States. 10:45 44 the Constitution of the United States. 10:46 45 Q The 14,000 files that you exported to an 10:44 46 external device on December 14th, 2015, were exported 10:45 47 so that you could use them to compete with Google by 10:45 48 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:49 14 2016 were exported so that you could compete with 10:46 15 Google by using Google's confidential information; 10:46 16 A On the advice and direction of my counsel, I 10:48 17 respectfully decline to answer. And I assert the 10:48 18 to join you at your new company to export documents 10:43 20 bring with you to Waymo to Otto? 21 A On the advice and direction of my counsel, I 10:44 22 respectfully decline to answer. And I assert the 10:48 23 rights guaranteed to me under the Fifth Amendment of 10:44 24 the Constitution of the United States. 10:49 25 Q Let me just ask that again, because I asked 10:48 26 A On the advice and direction	A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 the Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	17 Q You directed Google employees that you asked 10:47 18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
18 A On the advice and direction of my counsel, I 10:44 19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:44 27 respectfully decline to answer. And I assert the 10:44 28 rights guaranteed to me under the Fifth Amendment of 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 40 the Constitution of the United States. 10:44 41 the Constitution of the United States. 10:44 42 the Constitution of the United States. 10:44 43 rights guaranteed to me under the Fifth Amendment of 10:45 44 the Constitution of the United States. 10:48 54 Q The 14:000 files that you exported to an 10:44 65 external device on December 14th, 2015, were exported 10:45 74 so that you could use them to compete with Google by 10:45 85 using Google's confidential information; correct? 10:45 96 A On the advice and direction of my counsel, I 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:48 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:48 18 to join you at your new company to export documents 10:47 21 ha On the advice and direction of my counsel, I 10:44 22 respectfully decline to answer. And I assert the 10:48 23 rights guaran	A On the advice and direction of my counsel, I 10:44 espectfully decline to answer. And I assert the 10:44 eights guaranteed to me under the Fifth Amendment of 10:44 the Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	18 to join you at your new company to export documents 10:47 19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
19 respectfully decline to answer. And I assert the 10:44 20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 with Google; correct? 10:44 27 respectfully decline to answer. And I assert the 10:48 28 rights guaranteed to me under the Fifth Amendment of 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 41 the Constitution of the United States. 10:48 42 respectfully decline to answer. And I assert the 10:48 43 rights guaranteed to me under the Fifth Amendment of 10:44 44 the Constitution of the United States. 10:48 45 Q The 14:000 files that you exported to an 10:44 46 external device on December 14th, 2015, were exported 10:45 77 so that you could use them to compete with Google by 10:45 88 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, 1 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:48 13 Q The five files hat you could compete with 10:45 14 2016, were exported so that you could compete with 10:45 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, 1 10:46 16 A On the advice and direction of my counsel, 1 10:48 17 respectfully decline to answer. And I assert the 10:48 18 rights guaranteed to me under the Fifth Amendment of 10:48 19 from Google computers, before departing Google, to 10:48 21 it werong. 10:48 22 respectfully decline to answer. And I assert the 10:48 23 rights guaranteed to me under the Fifth Amendment of 10:44 24 the Constitution of the United States. 10:48 25 bring them with you to Otto? 10:48 26 A On the advice and direction of my counsel, 1 10:48 27 respectfully decline to answer. And	respectfully decline to answer. And I assert the 10:44 rights guaranteed to me under the Fifth Amendment of 10:44 respectively. The five files that you exported from 10:44 respectively. Google's internal drive database on January 3rd, 2016, 10:44 revere exported so that you could use them to compete 10:44	19 from Google computers, before departing Google, to 10:47 20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
20 rights guaranteed to me under the Fifth Amendment of 10:44 21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google: correct? 10:44 26 respectfully decline to answer. And I assert the 10:48 27 respectfully decline to answer. And I assert the 10:44 28 rights guaranteed to me under the Fifth Amendment of 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 40 the Constitution of the United States. 10:44 40 the Acontine advice and direction of my counsel, I 10:45 40 the Constitution of the United States. 10:44 41 trights guaranteed to me under the Fifth Amendment of 10:45 42 the Constitution of the United States. 10:48 43 to join you at your new company, to export documents 10:45 44 from Google computers, before departing Google, to 10:48 45 page 66 46 A On the advice and direction of my counsel, I 10:45 46 external device on December 14th, 2015, were exported 10:45 47 respectfully decline to answer. And I assert the 10:45 48 rights guaranteed to me under the Fifth Amendment of 10:45 49 A On the advice and direction of the United States. 10:48 40 Q You asked that former Google employees bring 10:48 41 respectfully decline to answer. And I assert the 10:45 41 respectfully decline to answer. And I assert the 10:45 42 the Constitution of the United States. 10:49 43 to join you at your new company, to export documents 10:45 44 from Google computers, before departing Google, to 10:48 45 prespectfully decline to answer. And I assert the 10:45 46 A On the advice and direction of my counsel, I 10:45 47 respectfully decline to answer. And I asser	ights guaranteed to me under the Fifth Amendment of 10:44 he Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	20 bring with you to Waymo to Otto? 10:47 21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
21 the Constitution of the United States. 10:44 22 Q The five files that you exported from 10:44 23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 respectfully decline to answer. And I assert the 10:48 27 respectfully decline to answer. And I assert the 10:44 28 rights guaranteed to me under the Fifth Amendment of 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 41 the Constitution of the United States. 10:48 42 the Constitution of the United States. 10:48 43 rights guaranteed to me under the Fifth Amendment of 10:44 44 the Constitution of the United States. 10:44 45 Q The 14,000 files that you exported to an 10:44 46 external device on December 14th, 2015, were exported 10:45 47 so that you could use them to compete with Google by 10:45 48 using Google's confidential information; correct? 10:45 40 A On the advice and direction of my counsel, I 10:45 41 rights guaranteed to me under the Fifth Amendment of 10:45 42 the Constitution of the United States. 10:48 43 rights guaranteed to me under the Fifth Amendment of 10:45 44 from Google computers, before departing Google, to 10:48 55 bring them with you to Otto? 10:48 64 A On the advice and direction of my counsel, I 10:45 75 respectfully decline to answer. And I assert the 10:45 76 A On the advice and direction of my counsel, I 10:45 77 respectfully decline to answer. And I assert the 10:45 81 rights guaranteed to me under the Fifth Amendment of 10:45 11 Google confidential information with them when they 10:48 11 rights guaranteed to me under the Fifth Amendment of 10:45 11 Google confidential information with them when they 10:48 11 rights guaranteed to me under the Fifth Amendment of 10:45 11 Google confidential information with them when they 10:48 11 rights guaranteed to me under the Fifth Amendment of 10:45 11 Google confidential information with them when they 10:48 11 rights guaranteed to me under the Fifth Amendment of 10:45 11	he Constitution of the United States. 10:44 Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	21 A On the advice and direction of my counsel, I 10:48 22 respectfully decline to answer. And I assert the 10:48
22	Q The five files that you exported from 10:44 Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	22 respectfully decline to answer. And I assert the 10:48
23 Google's internal drive database on January 3rd, 2016, 10:44 24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 with Google; correct? 10:44 27 respectfully decline to answer. And I assert the 10:44 28 rights guaranteed to me under the Fifth Amendment of 10:44 30 rights guaranteed to me under the Fifth Amendment of 10:44 40 the Constitution of the United States. 10:44 41 the Constitution of the United States. 10:44 42 external device on December 14th, 2015, were exported 10:45 43 using Google's confidential information; correct? 10:45 44 the Constitution of the United States. 10:44 55 Q The 14,000 files that you exported to an 10:44 66 external device on December 14th, 2015, were exported 10:45 79 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of my counsel, I 10:45 91 A On the advice and direction of the United States. 10:48 91 A On the advice and direction of my counsel, I 10:45 91 C S Q Let me just ask that again, because I asked 10:48 92 A to guaranteed to me under the Fifth Amendment of 10:44 93 to join you at your new company, to export documents 10:48 94 from Google computers, before departing Google, to 10:48 95 bring them with you to Otto? 10:48 96 A On the advice and direction of my counsel, I 10:48 97 to join you at your new company, to export documents 10:48 98 rights guaranteed to me under the Fifth Amendment o	Google's internal drive database on January 3rd, 2016, 10:44 were exported so that you could use them to compete 10:44	
24 were exported so that you could use them to compete 10:44 25 with Google; correct? 10:44 26 page 66 1 A On the advice and direction of my counsel, I 10:44 27 respectfully decline to answer. And I assert the 10:44 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:48 5 Q Let me just ask that again, because I asked 10:48 2 You directed Google employees, that you asked 10:48 4 from Google computers, before departing Google, to 10:48 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 employee who you asked to take confidential 10:49	were exported so that you could use them to compete 10:44	
25 with Google; correct? 10:44 Page 66 Page 66 1 A On the advice and direction of my counsel, I 10:44 2 respectfully decline to answer. And I assert the 10:44 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:44 5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:48 10 Q You asked that again, because I asked 10:48 Page 66 1 it wrong. 10:48 2 You directed Google employees, that you asked 10:48 4 from Google computers, before departing Google, to 10:48 5 bring them with you to Otto? 10:48 6 A On the advice and direction of my counsel, I 10:48 8 rights guaranteed to me under the Fifth Amendment of 10:48 10 Q You asked that former Google employees bring 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:49 16 the Constitution of the United States. 10:49 17 Q Sameer Kshirsagar was a former Google 10:49 18 employee who you asked to take confidential 10:49	•	
Page 66 Page 71 A On the advice and direction of my counsel, I 10:44 2 respectfully decline to answer. And I assert the 10:44 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:44 5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49	VIII G00gie, correct: 10.44	
1 A On the advice and direction of my counsel, I 10:44 2 respectfully decline to answer. And I assert the 10:44 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:44 5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:48 19 the Constitution of the United States. 10:45 10 Q You asked that former Google employees bring 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:46 15 rights guaranteed to me under the Fifth Amendment of 10:48 16 the Constitution of the United States. 10:49 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49		
2 respectfully decline to answer. And I assert the 10:44 3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:44 5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49		
3 rights guaranteed to me under the Fifth Amendment of 10:44 4 the Constitution of the United States. 10:44 5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49	•	
4 the Constitution of the United States. 10:44 5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 19 the Constitution of the United States. 10:48 10 Q You asked that former Google employees bring 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:48 16 the Constitution of the United States. 10:49 17 Q Sameer Kshirsagar was a former Google 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49		
5 Q The 14,000 files that you exported to an 10:44 6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 19 the Constitution of the United States. 10:48 10 Q You asked that former Google employees bring 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:49 17 Q Sameer Kshirsagar was a former Google 10:49 18 employee who you asked to take confidential 10:49		
6 external device on December 14th, 2015, were exported 10:45 7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:48 16 A On the advice and direction of my counsel, I 10:48 17 respectfully decline to answer. And I assert the 10:48 18 rights guaranteed to me under the Fifth Amendment of 10:45 19 the Constitution of the United States. 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:48 16 the Constitution of the United States. 10:49 17 Q Sameer Kshirsagar was a former Google 10:49 18 employee who you asked to take confidential 10:49		
7 so that you could use them to compete with Google by 10:45 8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:48 10 Q You asked that former Google employees bring 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:48 16 the Constitution of the United States. 10:49 17 Q Sameer Kshirsagar was a former Google 10:49 18 employee who you asked to take confidential 10:49	• •	
8 using Google's confidential information; correct? 10:45 9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:48 10 Q You asked that former Google employees bring 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:49 16 the Constitution of the United States. 10:49 17 Q Sameer Kshirsagar was a former Google 10:49 18 employee who you asked to take confidential 10:49	•	•
9 A On the advice and direction of my counsel, I 10:45 10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 employee who you asked to take confidential 10:49		
10 respectfully decline to answer. And I assert the 10:45 11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 employee who you asked that former Google employees bring 10:48 11 Google confidential information with them when they 10:48 12 joined your new company? 10:48 13 A On the advice and direction of my counsel, I 10:48 14 respectfully decline to answer. And I assert the 10:48 15 rights guaranteed to me under the Fifth Amendment of 10:49 16 the Constitution of the United States. 10:49 17 Q Sameer Kshirsagar was a former Google 10:49 18 employee who you asked to take confidential 10:49		
11 rights guaranteed to me under the Fifth Amendment of 10:45 12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49	A On the advice and direction of my counsel, I 10:45	
12 the Constitution of the United States. 10:45 13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49	•	
13 Q The five files you exported on January 3rd, 10:45 14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 employee who you asked to take confidential 10:49	rights guaranteed to me under the Fifth Amendment of 10:45	
14 2016, were exported so that you could compete with 10:46 15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 employee who you asked to take confidential 10:49	he Constitution of the United States. 10:45	12 joined your new company? 10:48
15 Google by using Google's confidential information? 10:46 16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:49 18 employee who you asked to take confidential 10:49	Q The five files you exported on January 3rd, 10:45	13 A On the advice and direction of my counsel, I 10:48
16 A On the advice and direction of my counsel, I 10:46 17 respectfully decline to answer. And I assert the 10:46 18 rights guaranteed to me under the Fifth Amendment of 10:46 19 the Constitution of the United States. 10:49 19 Q Sameer Kshirsagar was a former Google 10:49 19 the Constitution of the United States. 10:49 10 Q Sameer Kshirsagar was a former Google 10:49	2016, were exported so that you could compete with 10:46	
17 respectfully decline to answer. And I assert the 10:46 17 Q Sameer Kshirsagar was a former Google 10:49 18 rights guaranteed to me under the Fifth Amendment of 10:46 18 employee who you asked to take confidential 10:49	Google by using Google's confidential information? 10:46	15 rights guaranteed to me under the Fifth Amendment of 10:48
18 rights guaranteed to me under the Fifth Amendment of 10:46 18 employee who you asked to take confidential 10:49	A On the advice and direction of my counsel, I 10:46	16 the Constitution of the United States. 10:49
	respectfully decline to answer. And I assert the 10:46	17 Q Sameer Kshirsagar was a former Google 10:49
	rights guaranteed to me under the Fifth Amendment of 10:46	18 employee who you asked to take confidential 10:49
19 the Constitution of the United States. 10:46 19 information from Google to Otto; correct? 10:49	he Constitution of the United States. 10:46	19 information from Google to Otto; correct? 10:49
20 Q On January 11th, 2016, you exported a file 10:46 20 A On the advice and direction of my counsel, I 10:49	Q On January 11th, 2016, you exported a file 10:46	20 A On the advice and direction of my counsel, I 10:49
21 called "Chauffeur TL Weekly Updates Q4 2015" from 10:46 21 respectfully decline to answer. And I assert the 10:49	called "Chauffeur TL Weekly Updates Q4 2015" from 10:46	21 respectfully decline to answer. And I assert the 10:49
22 Google's internal drive database? 10:46 22 rights guaranteed to me under the Fifth Amendment of 10:49	Google's internal drive database? 10:46	22 rights guaranteed to me under the Fifth Amendment of 10:49
23 A On the direction of my counsel, I 10:46 23 the Constitution of the United States. 10:49	A On the direction of my counsel, I 10:46	23 the Constitution of the United States. 10:49
24 respectfully decline to answer. And I assert the 10:46 24 Q You encouraged Sameer to bring confidential 10:49	respectfully decline to answer And I assert the 10.46	24 Q You encouraged Sameer to bring confidential 10:49
	espectany decime to answer. And I assert the 10.40	25 information with him when you recruited him to join 10:49
25 rights guaranteed to me under the Fifth Amendment of 10:46 25 information with him when you recruited him to join 10:49		25 mornadon with him when you recruited min to join 10115

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 20 of 48 ATTORNEYS EYES ONLY

1 concernent		
3 reportfully decline to answer. And I assert the 10-49 4 rights guaranteed to me under the Fifth Amendment of 10-49 5 pour work at Uber; correct? 10-52 5 your work at Uber; correct? 10-52 5 your work at Uber; correct? 10-52 7 respectfully decline to answer. And I assert the 10-50 10	1 Otto; correct? 10:49	1 rights guaranteed to me under the Fifth Amendment of 10:52
A rights guaranteed to me under the Fifth Amendment of 10.49 5 the Constitution of the United States. 10.49 7 Otto because they had access to Google's confidential 10.50 8 A On the advice and direction of my counsel, 1 10.50 10 respectfully decline to answer. And 1 assert the 10.50 12 the Constitution of the United States. 10.50 13 Q You continue to retain the 14,000 documents of 10.50 14 Google and Waymo confidential information, that you 10.50 15 downloaded prior to your resignation of Google? 10.50 16 A On the advice and direction of my counsel, 1 10.50 17 respectfully decline to answer. And 1 assert the 10.50 18 rights guaranteed to me under the Fifth Amendment of 10.50 19 respectfully decline to answer. And 1 assert the 10.50 10 respectfully decline to answer. And 1 assert the 10.50 11 downloaded in December 215 10.50 12 the Constitution of the United States. 10.53 10 C You continue to retain the 14,000 documents 10.50 10 C You continue to retain the 14,000 documents 10.50 10 C You continue to retain the 14,000 documents 10.51 10 C You continue to retain the 14,000 documents 10.50 18 rights guaranteed to me under the Fifth Amendment of 10.50 20 Q You continue to retain the 14,000 documents 10.51 21 that you downloaded in December 15 - December 2015 10.50 22 from the Google SVN server? 10.53 23 A On the advice and direction of my counsel, 1 10.51 24 Q You still have the media device through which 10.51 25 rights guaranteed to me under the Fifth Amendment of 10.53 26 you downloaded the approximately 14,000 files in 10.51 27 rights guaranteed to me under the Fifth Amendment of 10.51 28 A On the advice and direction of my counsel, 1 10.51 3 you downloaded the approximately 14,000 files in 10.51 4 December 15 - December 2015 10.50 5 A On the advice and direction of my counsel, 1 10.51 5 A On the advice and direction of my counsel, 1 10.51 6 Q You have referred to the Hough Google Sylvasor of the United States. 10.53 7 rights guarantee	2 A On the advice and direction of my counsel, I 10:49	2 the Constitution of the United States. 10:52
5 the Constitution of the United States. 10-49 6 Q. You recruited Google employees to join you at 10-49 7 Otto because they had access to Google's confidential 10-50 8 information? 9 A. On the advice and direction of my counsel, 1 10-50 10 respectfully decline to answer. And I assert the 10-52 11 rights guaranteed to me under the Fifth Amendment of 10-50 12 the Constitution of the United States. 10-50 13 Q. You continue to retain documents, including 10-50 14 Google and Waymo confidential information, that you 10-59 15 Gownloaded prior to your resignation of Groogle? 10-50 16 A. On the advice and direction of my counsel, 1 10-50 10 respectfully decline to answer. And I assert the 10-52 11 rights guaranteed to me under the Fifth Amendment of 10-50 15 downloaded prior to your resignation of Groogle? 10-50 16 A. On the advice and direction of my counsel, 1 10-50 10 respectfully decline to answer. And I assert the 10-50 11 registration of the United States. 10-50 12 Google? 10-50 13 Q. You continue to retain the 14,000 documents 10-50 14 rights guaranteed to me under the Fifth Amendment of 10-50 15 q. Q. You continue to retain the 14,000 documents 10-50 16 A. On the advice and direction of the United States. 10-50 17 respectfully decline to answer and 1 assert the 10-52 18 rights guaranteed to me under the Fifth Amendment of 10-50 19 the Constitution of the United States. 10-51 19 downloaded in December 15 - December 2015 10-50 21 from the Google SVN server? 10-50 22 from the Google SVN server? 10-50 23 rights guaranteed to me under the Fifth Amendment of 10-51 24 respectfully decline to answer. And I assert the 10-50 25 rights guaranteed to me under the Fifth Amendment of 10-51 26 A. On the advice and direction of my counsel, 1 10-51 27 rights guaranteed to me under the Fifth Amendment of 10-51 28 p. Q. You to the United States. 10-51 29 Q. You to the United States. 10-51 20 downloaded the approximately 1,4000 documents by united to me under the Fifth Amendment of 10-51 21 rights guaranteed to me under the Fifth A	3 respectfully decline to answer. And I assert the 10:49	3 Q Uber has encouraged you to use the 10:52
6	4 rights guaranteed to me under the Fifth Amendment of 10:49	4 14,000 documents downloaded in December 2015 during 10:52
7 Otto because they had access to Google's confidential 10:50	5 the Constitution of the United States. 10:49	5 your work at Uber; correct? 10:52
8 Rights guaranteed to me under the Fifth Amendment of 10:52	6 Q You recruited Google employees to join you at 10:49	6 A On the advice and direction of my counsel, I 10:52
8 Information? 8 Rights guaranteed to me under the Fifth Amendment of 10.52 9 A On the advice and direction of my counsel, 1 10.50 11 rights guaranteed to me under the Fifth Amendment of 10.50 12 the Constitution of the United States. 10.50 13 Q Vua continue to retain direction of my counsel, 1 10.50 15 downloaded prior to your resignation of Google? 10.50 16 A On the advice and direction of my counsel, 1 10.50 17 respectfully decline to answer. And I assert the 10.50 18 rights guaranteed to me under the Fifth Amendment of 10.50 16 A On the advice and direction of my counsel, 1 10.50 17 respectfully decline to answer. And I assert the 10.50 19 the Constitution of the United States. 10.50 19 the Constitution of the United States. 10.50 20 Q You continue to retain the H4,000 documents 10.50 21 that you downloaded in December 15 — December 2015 10.50 22 from the Google SVN server? 10.50 23 A On the advice and direction of my counsel, 1 10.50 24 respectfully decline to answer. And I assert the 10.50 25 rights guaranteed to me under the Fifth Amendment of 10.50 26 respectfully decline to answer. And I assert the 10.51 3 you downloaded the approximately 14,000 files in 10.51 4 December 15 — December 2015; correct? 10.51 5 A On the advice and direction of my counsel, 1 10.51 6 respectfully decline to answer. And I assert the 10.51 7 tights guaranteed to me under the Fifth Amendment of 10.51 8 the Constitution of the United States. 10.51 9 Q You shill have the media device through which 10.51 1 he Constitution of the United States. 10.51 2 Pocember 15 — December 2015; correct? 10.51 3 you downloaded the approximately 14,000 files in 10.51 4 December 15 — December 2015; correct? 10.51 5 A On the advice and direction of my counsel, 1 10.51 6 respectfully decline to answer. And I assert the 10.51 7 rights guar		-
9		
10 respectfully decline to answer. And I assert the 10:50 11 rights guaranteed to me under the Fifth Amendment of 10:50 13 Q You continue to retain documents, including 10:50 14 Google and Waymo confidential information, that you 10:50 15 downloaded prior to your resignation of Google? 10:50 16 A On the advice and direction of my counsel, 1 10:50 17 respectfully decline to answer. And I assert the 10:50 19 the Constitution of the United States. 10:50 19 the Constitution of the United States. 10:50 20 Q You continue to retain the 14,000 document of 10:50 21 from the Google SVN server? 10:50 22 from the Google SVN server? 10:50 23 A On the advice and direction of my counsel, 1 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:50 26 respectfully decline to answer. And I assert the 10:51 3 you downloaded the approximately 14,000 flies in 10:51 3 you downloaded the approximately 14,000 flies in 10:51 4 December 15: December 2015; correct? 10:51 5 A On the advice and direction of my counsel, 1 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 10 A On the advice and direction of my counsel, 1 10:51 11 A On the advice and direction of my counsel, 1 10:51 12 respectfully decline to answer. And I assert the 10:51 13 Q You have referred to the 14,000 documents 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 the Constitution of the United States. 10:51 17 A On the advice and direction of my counsel, 1 10:51 18 the Constitution of the United States. 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10		
11 rights guaranteed to me under the Fifth Amendment of 10-50 12 becomstrution of the United States. 10-50 12 December 2015; 10-50 13 MS. RAY: Objection; form. 10-52 14 Google and Waymo confidential information, that you 10-50 15 Gownloaded prior to your resignation of Google? 10-50 15 MR. EHRLICH: You can answer. 10-52 15 downloaded prior to your resignation of Google? 10-50 15 THE WITNESS: On the advice and direction of 10-52 16 AO of the advice and direction of my coursel, I 10-50 16 my coursel, I respectfully decline to answer. And I assert the 10-50 19 MR. EHRLICH: You can answer. 10-52 17 assert the rights guaranteed to me under the Fifth Amendment of 10-50 19 MR. EHRLICH: You can answer. 10-52 18 rights guaranteed to me under the Fifth Amendment of 10-50 10 10 10 10 10 10 10		
12 the Constitution of the United States. 10-50 13 Q You continue to retain documents, including 10-50 15 MR. RAY: Objection; form. 10-52 15 downloaded prior to your resignation of Google? 10-50 16 A. On the advice and direction of my counsel, I 10-50 16 MR. RAY: Objection; form. 10-52 17 respectfully decline to answer. And I assert the 10-50 18 rights guaranteed to me under the Fifth Amendment of 10-50 19 the Constitution of the United States. 10-50 10-		
13		·
14 Google and Waymo confidential information, that you 10:50 15 downloaded prior to your resignation of Google? 10:50 16 A On the advice and direction of my counsel, I 10:50 17 respectfully decline to answer. And I assert the 10:50 18 Rights guaranteed to me under the Fifth Amendment of 10:50 22 from the Google SVN server? 10:50 22 from the Google SVN server? 10:50 23 A On the advice and direction of my counsel, I 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:50 Page 70 1 the Constitution of the United States. 10:51 2 Q You still have the media device through which 10:51 3 you downloaded the approximately 14,000 floss in 10:51 4 December 15 - December 2015; correct? 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 18 A On the advice and direction of my counsel, I 10:51 18 A On the advice and direction of my counsel, I 10:51 18 A On the advice and direction of my counsel, I 10:51 18 A On the advice and direction of my counsel, I 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 18 the Constitution of the United States. 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 18 for sepectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 rossession the 14,000 documents downloaded in 2015 during your work at Otto; correct? 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 r		
15 downloaded prior to your resignation of Google? 10:50		
16 A On the advice and direction of my counsel, I 10:50 17 respectfully decline to answer. And I assert the 10:50 18 rights guaranteed to me under the Fifth Amendment of 10:50 19 the Constitution of the United States. 10:50 20 Q You continue to retain the 14,000 documents 10:50 21 that you downloaded in December 2015 10:50 22 from the Google SVN server? 10:50 23 A On the advice and direction of my counsel, I 10:50 24 respectfully decline to answer. And I assert the 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:51 2 Q You still have the media device through which 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 Respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 C Q You take referred to the 14,000 documents 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under th		
17 respectfully decline to answer. And I assert the 10:50 18 rights guaranteed to me under the Fifth Amendment of 10:50 20 Q You continue to retain the 14,000 documents 10:50 21 that you downloaded in December 15 - December 2015 10:50 22 from the Google SVN server? 10:50 23 A On the advice and direction of my counsel, I 10:50 24 respectfully decline to answer. And I assert the 10:51 25 rights guaranteed to me under the Fifth Amendment of 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 - December 2015; orrect? 10:51 5 A On the advice and direction of my counsel, I 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 respectfully decline to answer. And I assert the 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 downloaded in 2015 during your work at 10to; correct? 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at 10to; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at 10to		
18 rights guaranteed to me under the Fifth Amendment of 10:50		
19 the Constitution of the United States. 10:50 20 Q You continue to retain the 14,000 documents 10:50 21 that you downloaded in December 2015 10:50 22 from the Google SVN server? 10:50 23 A On the advice and direction of my counsel, I 10:50 24 respectfully decline to answer. And I assert the 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:50 26 respectfully decline to answer. And I assert the 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 - December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:54 12 respectfully decline to answer. And I assert the 10:54 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 rights guaranteed to me under the Fifth Amendment of 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:54 18 re		
20 Q You continue to retain the 14,000 documents 10:50 21 that you downloaded in December 15 December 2015 10:50 22 from the Google SVN server? 10:50 23 A On the advice and direction of my counsel, I 10:50 24 respectfully decline to answer. And I assert the 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:51 2 Q You still have the media device through which 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:53 7 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct?		
21 that you downloaded in December 15 December 2015 10:50 22 Google? 10:53 22 Google? 10:53 23 A On the advice and direction of my counsel, I 10:50 24 respectfully decline to answer. And I assert the 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:50 70:50	19 the Constitution of the United States. 10:50	MR. PERLSON: Q. You have informed Goober 10:53
22 from the Google SVN server? 10:50 24 respectfully decline to answer. And I assert the 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:51 26 Q You still have the media device through which 10:51 27 Q You still have the media device through which 10:51 28 Q You still have the media device through which 10:51 39 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 50 A On the advice and direction of my counsel, 1 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:53 8 the Constitution of the United States. 10:53 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, 1 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:53 15 A On the advice and direction of my counsel, 1 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 A On the advice and direction of my counsel, 1 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 A On the advice and direction of my counsel, 1 10:51 12 a On the advice and direction of my counsel, 1 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:54 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, 1 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 A On the advice and direction of my counsel, 1 10:51 12 A On the	20 Q You continue to retain the 14,000 documents 10:50	20 and Uber and its management that you still have the 10:53
23 A On the advice and direction of my counsel, I 10:50 24 respectfully decline to answer. And I assert the 10:50 25 rights guaranteed to me under the Fifth Amendment of 10:50 26 rights guaranteed to me under the Fifth Amendment of 10:50 27 Page 70 1 the Constitution of the United States. 10:51 28 Q You still have the media device through which 10:51 39 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 5 A On the advice and direction of my counsel, I 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:54 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 a Continuation of the United States. 10:54 12 A On the advice and direction of my counsel, I 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:54 10 the Constitution of the United States. 10:54 10 the Constitution of the United States. 1	21 that you downloaded in December 15 December 2015 10:50	21 14,000 documents downloaded in December 2015 from 10:53
24 respectfully decline to answer. And I assert the 10:50 Page 70 1 the Constitution of the United States. 10:51 1 the Constitution of the United States. 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 2015; correct? 10:51 4 Deferment of 10:50 7 rights guaranteed to me under the Fifth Amendment of 10:51 5 A On the advice and direction of my counsel, I 10:51 5 The Constitution of the United States. 10:51	22 from the Google SVN server? 10:50	22 Google? 10:53
25 rights guaranteed to me under the Fifth Amendment of Page 70 1 the Constitution of the United States. 10:51 2 Q You still have the media device through which 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, 1 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 before you even left Google; correct? 10:54 12 a On the advice and direction of my counsel, I 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:54 20 Uber is aware that you have referred to the 10:52 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:54 24 A On the advice and direction of my counsel, I 10:54 25 documents you had downloaded in 2015	23 A On the advice and direction of my counsel, I 10:50	23 A On the advice and direction of my counsel, I 10:53
1 the Constitution of the United States. 10:51 2 Q You still have the media device through which 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 rights guaranteed to me under the Fifth Amendment of 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 before you even left Google; correct? 10:54 12 the Constitution of the United States. 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 21 4,000 documents downloaded in December 2015 during 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:54 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:54 26 the Constitution of the United States.	24 respectfully decline to answer. And I assert the 10:50	24 respectfully decline to answer. And I assert the 10:53
1 the Constitution of the United States. 10:51 2 Q You still have the media device through which 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:53 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Ober 10:51 13 respectfully decline to answer. And I assert the 10:51 14 the Constitution of the United States. 10:53 15 A On the advice and direction of my counsel, I 10:51 16 downloaded in 2015 during your work at Ober 20:51 17 respectfully decline to answer. And I assert the 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 de Constitution of the United States. 10:53 12 A On the advice and direction of my counsel, I 10:51 13 respectfully decline to answer. And I assert the 10:51 14 the Constitution of the United States. 10:53 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 de Constitution of the United States. 10:54 12 tage 20 the Constitution of the United States. 10:54 13 respectfully decline to answer. And I assert the 10:54 14 tights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 16 downloaded in 2015 from Google? 10:54 17 you informed him that you had at taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 19 rights guarante		25 rights guaranteed to me under the Fifth Amendment of 10:53
2 Q You still have the media device through which 10:51 3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 11 A On the advice and direction of my counsel, I 10:51 12 Tespectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 before you even left Google; correct? 10:54 12 Tespectfully decline to answer. And I assert the 10:51 13 respectfully decline to answer. And I assert the 10:51 14 trights guaranteed to me under the Fifth Amendment of 10:51 15 the Constitution of the United States. 10:54 16 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 20 Uber is aware that you have referred to the 10:52 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in 2015 from Google? 10:54 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:52 26 documents downloaded in 2015 from Google? 10:54 27 rights guaranteed to me under the Fifth Amendment of 10:54 28 the Constitution of the United States. 10:54 29 the Constitution of the United States. 10:54 20 respectfully de	Page 70	Page 72
3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Otto; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 defore you even left Google; correct? 10:54 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:54 14 the Constitution of the United States. 10:54 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 you informed him that you had taken the 10:54 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 A On the advice and direction of my counsel, I 10:54 20 the Constitution of the United States. 10:54 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:55 25 documents you had downloaded in 2015 from Google? 10:54 26 Uber, he did not tell you to return the 14,000 10:54 27 gour work at Uber; correct?	1 the Constitution of the United States. 10:51	1 the Constitution of the United States. 10:53
3 you downloaded the approximately 14,000 files in 10:51 4 December 15 December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Uber; correct? 10:51 11 defore you even left Google; correct? 10:54 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:54 14 the Constitution of the United States. 10:54 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:54 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:54 10 the Constitution of the United States. 10:54 11 downloaded in 2015 during your work at Uber; correct? 10:51 12 downloaded in 2015 during your work at Uber; correct? 10:51 13 respectfully decline to answer. And I assert the 10:52 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 16 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents	2 O You still have the media device through which 10:51	2 O You told Uber that you had in your personal 10:53
4 December 15 - December 2015; correct? 10:51 5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q When Mr. Kalanick recruited you to join Uber, 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 q When Mr. Kalanick recruited you to join Uber, 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 20 the Constitution of the United States. 10:52 21 q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:54 26 downloaded in 2015 during your work at Uber; correct? 10:51 27 rights guaranteed to me under the Fifth Amendment of 10:51 28 the Constitution of the United States. 10:52 29 respectfully decline to answer. And I assert the 10:54 20 respectfully decline to answer. And I assert the 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 documents you had downloaded in 2015 from Google? 10:55		
5 A On the advice and direction of my counsel, I 10:51 6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 the Constitution of the United States. 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 Q When Mr. Kalanick recruited you to join Uber, 10:54 10 the Constitution of the United States. 10:52 20 the Constitution of the United States. 10:52 21 q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:54 26 documents downloaded in 2015 from Google? 10:54 27 rights guaranteed to me under the Fifth Amendment of 10:54 28 duding the Linited States. 10:54 29 respectfully decline to answer. And I assert the 10:54 20 respectfully decline to answer. And I assert the 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kal	11 7	
6 respectfully decline to answer. And I assert the 10:51 7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:54 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 Q When Mr. Kalanick recruited you to join Uber, 10:54 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:54 10 the Constitution of the United States. 10:52 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 22 the Constitution of the United States. 10:54 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:52 25 documents you had in your personal 10:53 27 rights guaranteed to me under the Fifth Amendment of 10:51 29 Q You told Uber that you had in your personal 10:53 10 possession the 14,000 documents downloaded in 2015 10:54 11 before you even left Google; correct? 10:54 12 A On the advice and direction of my counsel, I 10:54 13 respectfully decline to answer. And I assert the 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 16 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 20 respectfully decline to answer. And I assert the 10:54 21 rights		-
7 rights guaranteed to me under the Fifth Amendment of 10:51 8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:54 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 G When Mr. Kalanick recruited you to join Uber, 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 possession the 14,000 documents downloaded in 2015 10:53 11 before you even left Google; correct? 10:54 12 A On the advice and direction of my counsel, I 10:54 13 respectfully decline to answer. And I assert the 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 16 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 19 A On the advice and direction of my counsel, I 10:54 20 respectfully decline to answer. And I assert the 10:54 21 q Uber is aware that you have referred to the 10:52 22 the Constitution of the United States. 10:54 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:52 25 respectfully decline to answer. And I assert the 10:55 26 documents you had downloaded in 2015 from Google? 10:55 27 documents you had downloaded in 2015 from Google? 10:55 28 documents you had downloaded in 2015 from Google? 10:55 29 documents you had downloaded in 2015 from Google? 10:55 20 documents you had downloaded in 2015 from Google? 10:55		
8 the Constitution of the United States. 10:51 9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:54 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:54 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:54 10 guaranteed to me under the Fifth Amendment of 10:54 11 the Constitution of the United States. 10:54 12 A On the advice and direction of my counsel, I 10:54 13 respectfully decline to answer. And I assert the 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 Q When Mr. Kalanick recruited you to join Uber, 10:54 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 A On the advice and direction of my counsel, I 10:54 20 the Constitution of the United States. 10:54 21 Q Uber is aware that you have referred to the 10:52 22 the Constitution of the United States. 10:54 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:55 26 documents you had downloaded in 2015 from Google? 10:55 27 respectfully decline to answer. And I assert the 10:54 28 documents you had downloaded in 2015 from Google? 10:55		
9 Q You have referred to the 14,000 documents 10:51 10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:54 18 respectfully decline to answer. And I assert the 10:51 19 q When Mr. Kalanick recruited you to join Uber, 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 q On the advice and direction of my counsel, I 10:54 20 the Constitution of the United States. 10:52 21 q Uber is aware that you have referred to the 10:52 23 q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:52 25 respectfully decline to answer. And I assert the 10:52 26 documents you had downloaded in 2015 from Google? 10:54 27 respectfully decline to answer. And I assert the 10:52 28 documents you had downloaded in 2015 from Google? 10:54 29 the Constitution of the United States. 10:52 20 respectfully decline to answer. And I assert the 10:54 20 the Constitution of the United States. 10:52 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:55 26 documents you had downloaded in 2015 from Google? 10:55		
10 downloaded in 2015 during your work at Otto; correct? 10:51 11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:54 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:52 25 documents you had downloaded in 2015 from Google? 10:54 26 documents downloaded in December 2015 during 10:52 27 documents you had downloaded in 2015 from Google? 10:54 28 documents you had downloaded in 2015 from Google? 10:54 29 documents you had downloaded in 2015 from Google? 10:54 20 the Constitution of the United States. 10:54 20 respectfully decline to answer. And I assert the 10:54 21 quaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:52 25 documents you had downloaded in 2015 from Google? 10:55		
11 A On the advice and direction of my counsel, I 10:51 12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:54 18 respectfully decline to answer. And I assert the 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 10 Q When Mr. Kalanick recruited you to join Uber, 10:54 11 prights guaranteed to me under the Fifth Amendment of 10:54 12 A On the advice and direction of my counsel, I 10:51 13 respectfully decline to answer. And I assert the 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 19 A On the advice and direction of my counsel, I 10:54 20 the Constitution of the United States. 10:52 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 14,000 documents downloaded in December 2015 during 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:55 25 documents you had downloaded in 2015 from Google? 10:55		
12 respectfully decline to answer. And I assert the 10:51 13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:54 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 A On the advice and direction of my counsel, I 10:51 10 Q When Mr. Kalanick recruited you to join Uber, 10:54 11 you informed him that you had taken the 10:54 12 A On the advice and direction of my counsel, I 10:54 13 respectfully decline to answer. And I assert the 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 16 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 19 A On the advice and direction of my counsel, I 10:54 20 the Constitution of the United States. 10:52 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 14,000 documents downloaded in December 2015 during 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 documents you had downloaded in 2015 from Google? 10:55		
13 rights guaranteed to me under the Fifth Amendment of 10:51 14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:54 10:52 11 Q Uber is aware that you have referred to the 10:52 12 14,000 documents downloaded in December 2015 during 10:52 13 respectfully decline to answer. And I assert the 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 16 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 19 A On the advice and direction of my counsel, I 10:54 20 respectfully decline to answer. And I assert the 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:52 25 respectfully decline to answer. And I assert the 10:55 25 documents you had downloaded in 2015 from Google? 10:55		
14 the Constitution of the United States. 10:51 15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:54 10 the Constitution of the United States. 10:52 10 Uber is aware that you have referred to the 10:52 11 Q Uber is aware that you have referred to the 10:52 12 14,000 documents downloaded in December 2015 during 10:52 13 Q While Mr. Kalanick recruited you to join Uber, 10:54 14 rights guaranteed to me under the Fifth Amendment of 10:54 15 the Constitution of the United States. 10:54 16 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 19 A On the advice and direction of my counsel, I 10:54 20 respectfully decline to answer. And I assert the 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 respectfully decline to answer. And I assert the 10:55		-
15 Q You have referred to the 14,000 documents 10:51 16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:51 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:52 25 respectfully decline to answer. And I assert the 10:54 26 documents downloaded in December 2015 during 10:52 27 documents downloaded in 2015 from Google? 10:54 28 documents downloaded in 2015 from Google? 10:54 29 documents downloaded in December 2015 during 10:52 20 documents downloaded in 2015 from Google? 10:54 20 documents downloaded in 2015 from Google? 10:55		
16 downloaded in 2015 during your work at Uber; correct? 10:51 17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 10:52 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:54 26 Q When Mr. Kalanick recruited you to join Uber, 10:54 17 you informed him that you had taken the 10:54 18 14,000 documents downloaded in 2015 from Google? 10:54 20 respectfully decline to answer. And I assert the 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 documents you had downloaded in 2015 from Google? 10:55		
17 A On the advice and direction of my counsel, I 10:51 18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 19 A On the advice and direction of my counsel, I 10:54 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 21 14,000 documents downloaded in December 2015 during 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:54 26 Uber, he did not tell you to return the 14,000 10:54 27 documents downloaded in 2015 from Google? 10:55 28 documents you had downloaded in 2015 from Google? 10:55		
18 respectfully decline to answer. And I assert the 10:51 19 rights guaranteed to me under the Fifth Amendment of 10:51 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:54 26 Q While Mr. Kalanick was recruiting you to join 10:54 27 Q While Mr. Kalanick was recruiting you to join 10:54 28 Q While Mr. Kalanick was recruiting you to join 10:54 29 Gocuments downloaded in 2015 from Google? 10:55 20 respectfully decline to answer. And I assert the 10:52 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 25 documents downloaded in 2015 from Google? 10:55		, ,
19 rights guaranteed to me under the Fifth Amendment of 10:51 20 the Constitution of the United States. 10:52 21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:54 25 respectfully decline to answer. And I assert the 10:54 26 Uber is aware that you have referred to the 10:52 27 tights guaranteed to me under the Fifth Amendment of 10:54 28 the Constitution of the United States. 10:54 29 the Constitution of the United States. 10:54 20 respectfully decline to answer. And I assert the 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 respectfully decline to answer. And I assert the 10:55	_	
20 the Constitution of the United States. 10:52 20 respectfully decline to answer. And I assert the 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 14,000 documents downloaded in December 2015 during 10:52 22 the Constitution of the United States. 10:54 23 your work at Uber; correct? 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 respectfully decline to answer. And I assert the 10:52 25 documents you had downloaded in 2015 from Google? 10:55	18 respectfully decline to answer. And I assert the 10:51	18 14,000 documents downloaded in 2015 from Google? 10:54
21 Q Uber is aware that you have referred to the 10:52 22 14,000 documents downloaded in December 2015 during 10:52 23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:52 25 respectfully decline to answer. And I assert the 10:52 26 17 rights guaranteed to me under the Fifth Amendment of 10:54 27 22 the Constitution of the United States. 10:54 28 Q While Mr. Kalanick was recruiting you to join 10:54 29 Uber, he did not tell you to return the 14,000 10:54 20 21 rights guaranteed to me under the Fifth Amendment of 10:54 21 rights guaranteed to me under the Fifth Amendment of 10:54 22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 documents you had downloaded in 2015 from Google? 10:55	19 rights guaranteed to me under the Fifth Amendment of 10:51	19 A On the advice and direction of my counsel, I 10:54
22 14,000 documents downloaded in December 2015 during 10:52 22 the Constitution of the United States. 10:54 23 your work at Uber; correct? 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54 25 respectfully decline to answer. And I assert the 10:52 25 documents you had downloaded in 2015 from Google? 10:55	20 the Constitution of the United States. 10:52	20 respectfully decline to answer. And I assert the 10:54
23 your work at Uber; correct? 10:52 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 A On the advice and direction of my counsel, I 10:52 24 Uber, he did not tell you to return the 14,000 10:54 25 respectfully decline to answer. And I assert the 10:52 25 documents you had downloaded in 2015 from Google? 10:55	21 Q Uber is aware that you have referred to the 10:52	21 mights ground to d to me under the Eifth Amendment of 10:54
24 A On the advice and direction of my counsel, I 10:52 24 Uber, he did not tell you to return the 14,000 10:54 25 respectfully decline to answer. And I assert the 10:52 25 documents you had downloaded in 2015 from Google? 10:55		21 rights guaranteed to me under the Firth Amendment of 10:34
25 respectfully decline to answer. And I assert the 10:52 25 documents you had downloaded in 2015 from Google? 10:55	22 14,000 documents downloaded in December 2015 during 10:52	
		22 the Constitution of the United States. 10:54
Page 71 Page 73	23 your work at Uber; correct? 10:52	22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54
	23 your work at Uber; correct? 10:52 24 A On the advice and direction of my counsel, I 10:52	22 the Constitution of the United States. 10:54 23 Q While Mr. Kalanick was recruiting you to join 10:54 24 Uber, he did not tell you to return the 14,000 10:54

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 21 of 48 ATTORNEYS EYES ONLY

1 A On the advice and direction of my counsel, I 10:55	1 the Constitution of the United States. 10:57
2 respectfully decline to answer. And I assert the 10:55	2 Q Uber was aware that you were sharing with 10:57
3 rights guaranteed to me under the Fifth Amendment of 10:55	3 them information obtained from the 14,000 files you 10:58
4 the Constitution of the United States. 10:55	4 downloaded in December 15 2015 as part of your 10:58
5 Q When Mr. Kalanick recruited you to join Uber, 10:55	5 consulting work for Uber? 10:58
6 he encouraged you to keep the 14,000 documents you had 10:55	6 MS. RAY: Objection; form. 10:58
7 downloaded in 2015 from Google and use them at Uber 10:55	7 MR. EHRLICH: You can answer. 10:58
8 when you joined Uber; correct? 10:55	8 THE WITNESS: Okay. 10:58
9 A On the advice and direction of my counsel, I 10:55	9 On the advice and direction of my counsel, I 10:58
10 respectfully decline to answer. And I assert the 10:55	10 respectfully decline to answer. And I assert the 10:58
11 rights guaranteed to me under the Fifth Amendment of 10:55	11 rights guaranteed to me under the Fifth Amendment of 10:58
12 the Constitution of the United States. 10:55	12 the Constitution of the United States. 10:58
13 Q You were retained as a consultant by Uber 10:55	MR. PERLSON: Q. Uber has never asked you to 10:58
14 before the Otto acquisition; correct? 10:55	14 return to Google or Waymo the 14,000 files you 10:58
15 A On the advice and direction of my counsel, I 10:55	15 downloaded in December 2015? 10:58
16 respectfully decline to answer. And I assert the 10:55	16 A On the advice and direction of my counsel, I 10:58
17 rights guaranteed to me under the Fifth Amendment of 10:55	17 respectfully decline to answer. And I assert the 10:58
18 the Constitution of the United States. 10:56	18 rights guaranteed to me under the Fifth Amendment of 10:58
19 Q You were retained as a consultant by Uber 10:56	19 the Constitution of the United States. 10:58
20 before you left Google; correct? 10:56	20 Q You have retained the the 14,000 files you 10:58
21 A On the advice and direct and direction of 10:56	21 downloaded in December 2015 so that you can continue 10:59
22 my counsel, I respectfully decline to answer. And I 10:56	22 to use this information at your work at Uber? 10:59
23 assert the rights guaranteed to me under the Fifth 10:56	23 A On the advice and direction of my counsel, I 10:59
24 Amendment of the Constitution of the United States. 10:56	24 respectfully decline to answer. And I assert the 10:59
25 Q The reason you were retained as a consultant 10:56	25 rights guaranteed to me under the Fifth Amendment of 10:59
Page 74	Page 76
1 by Uber before the Otto acquisition was so that you 10:56	1 the Constitution of the United States. 10:59
2 could share the confidential information you learned 10:56	2 Q Uber has start over again. 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56	 Q Uber has start over again. 10:59 Uber has instructed you, and continues to 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56	 Q Uber has start over again. 10:59 Uber has instructed you, and continues to 10:59 instruct you, to keep the 14,000 files you downloaded 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57 19 The information that you shared with Uber 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00 19 A On the advice and direction of my counsel, I 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57 19 The information that you shared with Uber 10:57 20 while you were a consultant for Uber included 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00 19 A On the advice and direction of my counsel, I 11:00 20 respectfully decline to answer. And I assert the 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57 19 The information that you shared with Uber 10:57 20 while you were a consultant for Uber included 10:57 21 information from the 14,000 files you downloaded in 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00 19 A On the advice and direction of my counsel, I 11:00 20 respectfully decline to answer. And I assert the 11:00 21 rights guaranteed to me under the Fifth Amendment of 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57 19 The information that you shared with Uber 10:57 20 while you were a consultant for Uber included 10:57 21 information from the 14,000 files you downloaded in 10:57 22 December 2015? 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00 19 A On the advice and direction of my counsel, I 11:00 20 respectfully decline to answer. And I assert the 11:00 21 rights guaranteed to me under the Fifth Amendment of 11:00 22 the Constitution of the United States. 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57 19 The information that you shared with Uber 10:57 20 while you were a consultant for Uber included 10:57 21 information from the 14,000 files you downloaded in 10:57 22 December 2015? 10:57 23 A On the advice and direction of my counsel, I 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00 19 A On the advice and direction of my counsel, I 11:00 20 respectfully decline to answer. And I assert the 11:00 21 rights guaranteed to me under the Fifth Amendment of 11:00 22 the Constitution of the United States. 11:00 23 Q You have retained the the 14,000 files you 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57 19 The information that you shared with Uber 10:57 20 while you were a consultant for Uber included 10:57 21 information from the 14,000 files you downloaded in 10:57 22 December 2015? 10:57 23 A On the advice and direction of my counsel, I 10:57 24 respectfully decline to answer. And I assert the 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00 19 A On the advice and direction of my counsel, I 11:00 20 respectfully decline to answer. And I assert the 11:00 21 rights guaranteed to me under the Fifth Amendment of 11:00 22 the Constitution of the United States. 11:00 23 Q You have retained the the 14,000 files you 11:00 24 downloaded in December 2015 and the other information 11:00
2 could share the confidential information you learned 10:56 3 while you were employed by Google with Uber? 10:56 4 A On the advice and direction of my counsel, I 10:56 5 respectfully decline to answer. And I assert the 10:56 6 rights guaranteed to me under the Fifth Amendment of 10:56 7 the Constitution of the United States. 10:56 8 Q While you were acting as a consultant for 10:56 9 Uber, you did share Google confidential information 10:56 10 you learned while you were employed by Google with 10:57 11 Uber? 10:57 12 A On the advice and direction of my counsel, I 10:57 13 respectfully decline to answer. And I assert the 10:57 14 rights guaranteed to me under the Fifth Amendment of 10:57 15 the Constitution of the United States. 10:57 16 Q While the the start over again. 10:57 17 The information that you shared with 10:57 18 Google let me start over again. 10:57 19 The information that you shared with Uber 10:57 20 while you were a consultant for Uber included 10:57 21 information from the 14,000 files you downloaded in 10:57 22 December 2015? 10:57 23 A On the advice and direction of my counsel, I 10:57	2 Q Uber has start over again. 10:59 3 Uber has instructed you, and continues to 10:59 4 instruct you, to keep the 14,000 files you downloaded 10:59 5 in December 2015 so that you can continue to use this 10:59 6 information at your work at Uber? 10:59 7 A On the advice and direction of my counsel, I 10:59 8 respectfully decline to answer. And I assert the 10:59 9 rights guaranteed to me under the Fifth Amendment of 10:59 10 the Constitution of the United States. 11:00 11 Q You have retained the information let me 11:00 12 start over again. 11:00 13 You have retained the 14,000 documents and 11:00 14 other strike that. 11:00 15 You have retained the 14,000 documents you 11:00 16 downloaded in December 2015 because it contains 11:00 17 information that is not generally known in the 11:00 18 relevant field of that information? 11:00 19 A On the advice and direction of my counsel, I 11:00 20 respectfully decline to answer. And I assert the 11:00 21 rights guaranteed to me under the Fifth Amendment of 11:00 22 the Constitution of the United States. 11:00 23 Q You have retained the the 14,000 files you 11:00

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 22 of 48 ATTORNEYS EYES ONLY

1 You have retained the 14,000 files you 11:00	1 said that he would love to put you on the witness 11:04
2 downloaded in 2015 because it derives independent 11:01	2 stand to explain what happened, because he thinks you 11:04
3 economic value from the fact that the information in 11:01	3 have a good story to tell? 11:04
4 those documents is not generally known in the relevant 11:01	4 MS. RAY: I instruct you not to answer to the 11:04
5 field; correct? 11:01	5 extent that what you know is as the result of 11:04
6 A On the advice and direction of my counsel, I 11:01	6 attorney-client privileged communications. But you 11:04
7 respectfully decline to answer. And I assert the 11:01	7 may otherwise answer. 11:04
8 rights guaranteed to me under the Fifth Amendment of 11:01	8 MR. EHRLICH: I join in that instruction. 11:04
9 the Constitution of the United States. 11:01	9 But, to the extent it goes beyond that, I instruct you 11:04
10 Q The 14,000 files that you downloaded in 11:01	10 to assert your rights. 11:04
11 December 2015 contain trade secrets; correct? 11:01	11 THE WITNESS: On the advice and direction of 11:04
12 MS. RAY: Objection; form. 11:01	12 my counsel, I respectfully decline to answer. And I 11:04
13 MR. EHRLICH: You can answer. 11:01	13 assert the rights guaranteed to me under the Fifth 11:04
14 THE WITNESS: Okay. 11:01	14 Amendment of the Constitution of the United States. 11:05
15 On the advice and direction of my counsel, I 11:01	MR. PERLSON: Q. Do you have a good story to 11:05
16 respectfully decline to answer. And I assert the 11:01	16 tell in this case? 11:05
17 rights guaranteed to me under the Fifth Amendment of 11:01	17 A On the advice and direction of my counsel, I 11:05
18 the Constitution of the United States. 11:02	18 respectfully decline to answer. And I assert the 11:05
19 MR. PERLSON: Q. You retained the five files 11:02	19 rights guaranteed to me under the Fifth Amendment of 11:05
20 you exported in January 2016 because it contains 11:02	20 the Constitution of the United States. 11:05
21 informa they contain information that derive 11:02	21 Q Have you told your good story to 11:05
22 independent economic value from the fact that it is 11:02	22 Mr. Gonzalez? 11:05
23 not generally known? 11:02	23 A On the advice and direction of my counsel, I 11:05
24 A On the advice and direction of my counsel, I 11:02	24 respectfully decline to answer. And I assert the 11:05
25 respectfully decline to answer. And I assert the 11:02	25 rights granted to me under the Fifth Amendment of the 11:05
Page 78	Page 80
1 rights guaranteed to me under the Fifth Amendment of 11:02	1 Constitution of the United States. 11:05
2 the Constitution of the United States. 11:02	2 Q Is part of your good story that you received 11:05
3 Q You have used the confidential information 11:02	3 a bachelor of science degree in industrial engineering 11:05
4 contained in the five files exported on January 3rd, 11:03	4 and operations research in 2002 from the University of 11:05
5 2016, for the benefit of Uber in the past? 11:03	5 California at Berkeley? 11:05
6 A On the advice and direction of my counsel, I 11:03	6 MR. EHRLICH: Hold on one second. Let me 11:05
7 respectfully decline to answer. And I assert the 11:03	7 just the question is whether that's part of your 11:05
8 rights guaranteed to me under the Fifth Amendment of 11:03	8 good story. 11:05
9 the Constitution of the United States. 11:03	9 So, I'm going to instruct you to assert your 11:05
10 Q You expect to continue to use the 14,000 11:03	10 rights. Go ahead. 11:05
11 documents you downloaded in December 2015 for the 11:03	11 THE WITNESS: Okay. 11:05
12 benefit of Uber; correct? 11:03	On the advice and direction of my counsel, I 11:05
13 A On the advice and direction of my counsel, I 11:03	13 respectfully decline to answer. And I assert the 11:05
14 respectfully decline to answer. And I assert the 11:03	14 rights guaranteed to me under the Fifth Amendment of 11:05
15 rights guaranteed to me under the Fifth Amendment of 11:03	15 the Constitution of the United States. 11:06
16 the Constitution of the United States. 11:03	16 MR. EHRLICH: Mr. Perlson, just can I 11:06
17 Q You expect to continue to use the five files 11:03	17 for the record, my partner, Ismail Ramsey, has joined. 11:06
18 you downloaded on January 3rd, 2016, for the benefit 11:03	18 And, if I could just take a pause. I know 11:06
19 of Uber? 11:04	19 that wasn't your question here. But as is clear, 11:06
20 A On the advice and direction of my counsel, I 11:04	20 he's he's being instructed to assert his 11:06
21 respect I respectfully decline to answer. And I 11:04	21 constitutional rights very broadly. 11:06
22 assert the rights guaranteed to me under the Fifth 11:04	However, if you did want to ask about any of 11:06
23 Amendment of the Constitution of the United States. 11:04	23 his work or upbringing before joining Google, you can 11:06
24 Q Are you aware that, in a hearing before the 11:04	
· · · · · · · · · · · · · · · · · · ·	24 go ahead and ask those questions, if if that's of 11:06
25 judge in this case, Uber's lawyer, Arturo Gonzalez, 11:04	
	24 go ahead and ask those questions, if if that's of 11:06

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 23 of 48 ATTORNEYS EYES ONLY

1 MR. PERLSON: Thanks. 11:06	1 The time is 11:24.
2 Q Is part of your good story that you received 11:06	2 MR. PERLSON: Q. Mr. Levandowski, is part of 11:24
3 a master's degree from Berkeley in 2003? 11:06	3 your good story that you developed a self-driving 11:24
4 A On the advice and direction of my counsel, I 11:06	4 motorcycle that entered the DARPA Challenge of in 11:24
5 respectfully decline to answer. And I assert the 11:06	5 2004? 11:24
6 rights guaranteed to me under the Fifth Amendment of 11:06	6 A On the advice and direction of my counsel, I 11:24
7 the Constitution of the United States. 11:07	7 respectfully decline to answer. And I assert the 11:24
8 Q Is part of your good story that you developed 11:07	8 rights guaranteed to me under the Fifth Amendment of 11:24
9 technology for a robotic motorcycle between 2003 and 11:07	9 the Constitution of the United States. 11:24
10 2006? 11:07	10 Q Is part of your good story that you were the 11:24
11 A On the advice and direction of my counsel, I 11:07	11 chief technologist of unmanned systems at ENSCO, Inc., 11:24
12 respectfully decline to answer. And I assert the 11:07	12 from 2006 to 2007? 11:25
13 rights guaranteed to me under the Fifth Amendment of 11:07	13 A On the advice and direction of my counsel, I 11:25
14 the Constitution of the United States. 11:07	14 respectfully decline to answer. And I assert the 11:25
15 MR. EHRLICH: And excuse me, Counsel. I just 11:07	15 rights guaranteed to me under the Fifth Amendment of 11:25
16 want to make clear I want to make sure I 11:07	16 the Constitution of the United States. 11:25
17 understand. 11:07	17 Q Is part of your story the work you did I'm 11:25
18 You're not asking the question of fact 11:07	18 sorry. 11:25
19 whether he, in fact, did these things, or whether he 11:07	19 Is part of your good story the work you did 11:25
20 had this education or, you know, developed this 11:07	20 for Google between 2007 and 2016? 11:25
21 robotic motorcycle. 11:07	21 A On the advice and direction of my counsel, I 11:25
22 You're framing it in terms of whether that's 11:07	22 respectfully decline to answer. And I assert the 11:25
23 part of the good story that Mr. Gonzalez was referring 11:07	23 rights guaranteed to me under the Fifth Amendment of 11:25
24 to? 11:07	24 the Constitution of the United States. 11:25
25 MR. PERLSON: I'm asking the questions that 11:07	25 Q Did the work that you did while you were at 11:25
Page 82	Page 84
1 I'm asking. And the Judge Alsup's rules, I think, 11:07	1 Berkeley have to do with have anything to do with 11:25
1 I'm asking. And the Judge Alsup's rules, I think, 11:07 2 are pretty clear that, if you have an objection, you 11:07	1 Berkeley have to do with have anything to do with 11:25 2 the work that you did while you were at Google? 11:25
	, ,
2 are pretty clear that, if you have an objection, you 11:07	2 the work that you did while you were at Google? 11:25
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08 19 Can we go off the record a moment, please. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26 19 relating to self-driving vehicles have anything to do 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08 19 Can we go off the record a moment, please. 11:08 20 MR. PERLSON: Sure. There's not I don't 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26 19 relating to self-driving vehicles have anything to do 11:26 20 with the work that you did at Google? 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08 19 Can we go off the record a moment, please. 11:08 20 MR. PERLSON: Sure. There's not I don't 11:08 21 think there's a question. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26 19 relating to self-driving vehicles have anything to do 11:26 20 with the work that you did at Google? 11:26 21 A I'm going to 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08 19 Can we go off the record a moment, please. 11:08 20 MR. PERLSON: Sure. There's not I don't 11:08 21 think there's a question. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26 19 relating to self-driving vehicles have anything to do 11:26 20 with the work that you did at Google? 11:26 21 A I'm going to 11:26 22 MR. EHRLICH: On on that question, because 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08 19 Can we go off the record a moment, please. 11:08 20 MR. PERLSON: Sure. There's not I don't 11:08 21 think there's a question. 11:08 22 THE VIDEOGRAPHER: We are going off the 11:08 23 record. The time is 11:08. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26 19 relating to self-driving vehicles have anything to do 11:26 20 with the work that you did at Google? 11:26 21 A I'm going to 11:26 22 MR. EHRLICH: On on that question, because 11:26 23 I'm trying to be very clear to preserve 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08 19 Can we go off the record a moment, please. 11:08 20 MR. PERLSON: Sure. There's not I don't 11:08 21 think there's a question. 11:08 22 THE VIDEOGRAPHER: We are going off the 11:08 23 record. The time is 11:08. 11:08 24 (Recess taken.) 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26 19 relating to self-driving vehicles have anything to do 11:26 20 with the work that you did at Google? 11:26 21 A I'm going to 11:26 22 MR. EHRLICH: On on that question, because 11:26 23 I'm trying to be very clear to preserve 11:26 24 Mr. Levandowski's Fifth Amendment privilege here, that 11:26
2 are pretty clear that, if you have an objection, you 11:07 3 say it in the basis of form. 11:07 4 MR. EHRLICH: Okay. 11:07 5 MR. PERLSON: So, if you want to object on 11:07 6 the basis of form 11:07 7 MR. EHRLICH: So no, I don't want to object. 11:07 8 I just would thought it might be helpful if you 11:07 9 want answers to those questions. But I'll I'll 11:08 10 I won't object, and you can go ahead. 11:08 11 I don't know if there's a question. 11:08 12 MR. PERLSON: I don't, either. 11:08 13 MR. EHRLICH: I think there wasn't, but I 11:08 14 I wanted to offer that. 11:08 15 MR. PERLSON: Okay. 11:08 16 MS. RAY: Could could you hold on a 11:08 17 moment. 11:08 18 May we chat a moment. 11:08 19 Can we go off the record a moment, please. 11:08 20 MR. PERLSON: Sure. There's not I don't 11:08 21 think there's a question. 11:08 22 THE VIDEOGRAPHER: We are going off the 11:08 23 record. The time is 11:08. 11:08	2 the work that you did while you were at Google? 11:25 3 MR. EHRLICH: You can answer the question 11:25 4 about your work at Berkeley the the nature of 11:25 5 your work at Berkeley. 11:25 6 THE WITNESS: Sure. 11:25 7 I 11:25 8 MR. EHRLICH: But but I'm going to 11:25 9 instruct you not to answer in any way about matters 11:25 10 that occurred after the date you began employment with 11:26 11 Google. 11:26 12 THE WITNESS: Okay. 11:26 13 Well, I can't answer whether it relates or 11:26 14 not. But I can say that, at Berkeley, I worked on 11:26 15 self-driving vehicles, indoors, outdoors, and other 11:26 16 robotic vehicles. 11:26 17 MR. PERLSON: Q. And, did the work that 11:26 18 you and does the work that you did at Berkeley 11:26 19 relating to self-driving vehicles have anything to do 11:26 20 with the work that you did at Google? 11:26 21 A I'm going to 11:26 22 MR. EHRLICH: On on that question, because 11:26 23 I'm trying to be very clear to preserve 11:26

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 24 of 48 ATTORNEYS EYES ONLY

1		
3 comparisons between the two, because you are not 11:26 4 answering questions about matters occurring after you 11:27 5 began employment with Google. 11:27 6 Go ahead. 11:27 7 THE WITNESS: Can I have you repeat the 11:27 8 question then. 11:27 9 MR. PERLSON: Sure. 11:27 10 THE WITNESS: Lon I have you can look here. 11:27 11 MR. EHRLICH: Yeah, maybe you can look here. 11:27 12 THEW TINESS: Yeah. 11:27 13 And does — okay. And, did the work that — 11:27 14 the work that you did at Berkeley, relating to 11:27 15 self-driving vehicle, have anything to do with the 11:27 16 work that you did at Google? 11:29 17 MR. PERLICH: All Google. So, answer the 11:27 18 first part. 11:27 19 THE WITNESS: All Berkeley, I worked on 11:27 19 THE WITNESS: All Berkeley, I worked on 11:27 20 multiple projects, including navigation of vehicles. 11:27 21 analytequation, using cameras, GPS, and other semons. 11:27 22 navigation, using cameras, GPS, and other semons. 11:28 23 just described that you did at Ber. — Berkeley have 11:28 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described, while you were at Berkeley, have 11:28 3 my relation to the work that you did at Google? 11:28 4 THE WITNESS: — all other and the relation of my counsel, I respectfully lines the proper to the line of the proper to the work that you in the proper to the work that you in the proper to the proper		
A answering questions about matters occurring after you 11:27 5 began employment with Google. 11:27 5 began employment with Google. 11:27 5 guaranteed to me under the Fifth Amendment of the 11:29 7 7 THE WTINESS: Can I have you repeat the 11:27 8 stelf-driving vehicle technology that you worked on at 11:29 9 MR. PERLSON: Sure. 11:27 10 THE WTINESS: I can probably read it. 11:27 12 THE WTINESS: I can probably read it. 11:27 13 And does - okay. And, did the work that - 11:27 13 And does - okay. And, did the work that - 11:27 13 And does - okay. And, did the work that - 11:27 13 the work that you did at Berkeley. relating to 11:27 13 the work that you did at Google? 11:27 15 self-driving vehicle, have anything to do with the 11:27 15 self-driving vehicle, have anything to do with the 11:27 15 self-driving vehicle, have anything to do with the 11:27 15 Work that you did at Google? 11:28 11:30	,	
5 Segame employment with Grougle.	3 comparisons between the two, because you are not 11:26	3 my counsel, I respectfully decline to answer. And I 11:29
6	4 answering questions about matters occurring after you 11:27	4 assert the rights and I assert the rights 11:29
THE WITNESS: Can I have you repeat the 11:27	5 began employment with Google. 11:27	5 guaranteed to me under the Fifth Amendment of the 11:29
8 question then.	6 Go ahead. 11:27	6 Constitution of the United States. 11:29
9	7 THE WITNESS: Can I have you repeat the 11:27	7 MR. PERLSON: Q. And how does the 11:29
10	8 question then. 11:27	8 self-driving vehicle technology that you worked on at 11:29
11 MR. EHRLICH: Yeah, maybe you can look here. 11:27 12 THE WITNESS: Yeah. 11:29 12 12 12 13 And does — okay. And, did the work that — 11:27 14 the work that you did at Berkeley, relating to 11:27 15 self-driving webicle, have anything to do with the 11:27 15 self-driving webicle, have anything to do with the 11:27 15 self-driving webicle, have anything to do with the 11:27 15 self-driving webicle, that you did at Google? 11:27 15 self-driving motorcycle that entered the DARPA 11:29 17 MR. EHRLICH: At Google. So, answer the 11:27 17 Grand Challenge in 2004, relate to the work that you 11:30 11:30 11:30 11:30 11:30 12:30	9 MR. PERLSON: Sure. 11:27	9 Goo at Google relate to the work you've described 11:29
12	10 THE WITNESS: I can probably read it. 11:27	10 at Berkeley? 11:29
13 And does — okay. And, did the work that — 11:27 14 the work that you did at Berkeley, relating to 11:27 15 self-driving welicle, have amplying to do with the 11:27 16 work that you did at Berkeley, relating to 11:27 17 MR. EHRLICH: At Google. So, answer the 11:27 17 MR. EHRLICH: At Google. So, answer the 11:27 19 THE WITNESS: At Berkeley, I worked on 11:27 19 THE WITNESS: At Berkeley, I worked on 11:27 19 THE WITNESS: At Berkeley, I worked on 11:27 19 THE WITNESS: At Berkeley, I worked on 11:27 19 An of the advice and direction of my counsel, I 11:30 11	11 MR. EHRLICH: Yeah, maybe you can look here. 11:27	11 A On the advice and direction of my counsel, I 11:29
14 the work that you did at Berkeley, relating to 11:27 15 self-driving vehicle, have anything to do with the 11:27 15 self-driving vehicle, have anything to do with the 11:27 16 work that you did at Google? 11:27 17 MR. EHRLICH: At Google. So, answer the 11:27 18 first part. 11:27 19 THE WITNESS: At Berkeley, I worked on 11:27 20 multiple projects, including navigation of vehicles, 11:27 21 self-driving vehicles built on – using Java for 11:27 22 mavigation, using cameras, GPS, and other sensors, 11:27 23 too. 11:28 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber	12 THE WITNESS: Yeah. 11:27	12 respectfully decline to answer. And I assert the 11:29
15 self-driving vehicle, have anything to do with the 11:27 16 work that you did at Google? 11:27 17 MR. EHRLICH: At Google. So, answer the 11:27 18 first part. 11:27 19 THE WITNESS: At Berkeley, I worked on 11:27 20 multiple projects, including navigation of vehicles. 11:27 21 self-driving vehicles built on — using Java for 11:27 22 navigation, using cameras, GPS, and other sensors, 11:27 23 too. 11:28 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber. — Berkeley have 11:28 26 A On the — 11:28 27 A On the — 11:28 28 A THE WITNESS: — advice of — on the — on 11:28 39 MR. EHRLICH: I'll instruct you — 11:28 40 THE WITNESS: — advice of — on the — on 11:28 41 THE WITNESS: — advice of — on the — on 11:28 42 A THE WITNESS: — advice of — on the — on 11:28 43 MR. FERLSON: Q. And, does the work that you 11:28 44 THE WITNESS: — advice of — on the — on 11:28 45 the advice and direction of my counsel, I respectfully 11:28 46 decline to answer. And I assert the rights guaranteed 11:28 47 to me under the Fifth Amendment of the Constitution of 11:28 48 the United States. 11:28 49 MR. PERLSON: Q. And, does the work that you does th	And does okay. And, did the work that 11:27	13 rights guaranteed to me under the Fifth Amendment of 11:29
16 to the self-driving motorcycle that entered the DARPA 11:29 17 Grand Challenge in 2004, relate to the work that you 11:30 11:27 18 did for Google in self-driving vehicle to the work that you 11:30 11:27 20 multiple projects, including navigation of vehicles, 11:27 21 self-driving vehicles built on — using Java for 11:27 22 mavigation, using cameras, GPS, and other sensors, 11:27 23 too. 11:28 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber-— Berkeley have 11:28 25 just described that you did at Ber-— Berkeley have 11:28 27 just described that you did at Google? 11:28 28 didice to answer. And 1 assert the 11:30 11:30 29 may relation to the work that you 11:28 29 MR. PERLSON: Q. And, does the work that you 11:28 29 MR. PERLSON: Q. And, does the work that you 11:28 3 skihim, of course. If syour choice. 11:30 3 skihim, of course. If syour choice. 11:30 3 skihim, of course. If syour choice. 11:30 11:30 3 skihim, of course. If syour choice. 11:30	14 the work that you did at Berkeley, relating to 11:27	14 the Constitution of the United States. 11:29
16 to the self-driving motorcycle that entered the DARPA 11:29 17 Grand Challenge in 2004, relate to the work that you 11:30 11:27 18 did for Google in self-driving vehicle to the work that you 11:30 11:27 20 multiple projects, including navigation of vehicles, 11:27 21 self-driving vehicles built on — using Java for 11:27 22 mavigation, using cameras, GPS, and other sensors, 11:27 23 too. 11:28 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber-— Berkeley have 11:28 25 just described that you did at Ber-— Berkeley have 11:28 27 just described that you did at Google? 11:28 28 didice to answer. And 1 assert the 11:30 11:30 29 may relation to the work that you 11:28 29 MR. PERLSON: Q. And, does the work that you 11:28 29 MR. PERLSON: Q. And, does the work that you 11:28 3 skihim, of course. If syour choice. 11:30 3 skihim, of course. If syour choice. 11:30 3 skihim, of course. If syour choice. 11:30 11:30 3 skihim, of course. If syour choice. 11:30	15 self-driving vehicle, have anything to do with the 11:27	15 Q How does the work that you did, in relation 11:29
17 MR. EHRLICH: Ad Google. So, answer the 11:27 18 first part. 11:27 18 first part. 11:27 19 THE WITNESS: At Berkeley, I worked on 11:27 19 MR DERLSON: Q. And does the work that you 11:28 21 myr leation to the work that you did at Google? 11:28 22 myr leation to the work that you did at Google? 11:28 23 MR. EHRLICH: Fill instruct you 11:28 24 myr leation to the work that you 11:28 25 myr leation for the work that you 11:28 26 decline to answer. And I assert the rights guaranteed 11:30 11		
18 first part. 18 did for Google in self-driving vehicle technology? 11:30 11:30 21 self-driving vehicles built on — using Java for 11:27 21 rights guaranteed to me under the Fifth Amendment of 11:30 22 navigation, using cameras, GPS, and other sensors, 11:27 22 time Constitution of the United States. 11:30 23 mR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Bers—Berkeley have 11:28 28 A On the = 11:28 29 and interest of the work that you 11:28 29 and interest of the work that you did at Google? 11:28 29 and interest of the work that you did at Google? 11:28 20 and interest of the work that you of the work that you 11:28 20 and interest of the work that you of the work that you 11:28 20 and interest of the work that you 11:28 21 fights guaranteed to me under the Fifth Amendment of the Constitution of the United States. 11:30		
19 THE WITNESS: At Berkeley, I worked on 11:27 20 multiple projects, including navigation of vehicles, 11:27 21 self-driving vehicles built on - using Java for 11:27 22 navigation, using cameras, GPS, and other sensors, 11:27 23 too. 11:28 24 MR, PERLSON: Q. And does the work that you 11:28 25 just described that you did at Bers—Berkeley have 11:28 26 a Non the - 11:28 27 a Non the - 11:28 28 A On the - 11:28 29 MR, EHRLICH: I'll instruct you - 11:28 30 MR, EHRLICH: I'll instruct you - 11:28 40 THE WITNESS: - advice of - on the - on 11:28 50 the advice and direction of my counsel, I respectfully 11:28 51 the advice and direction of my counsel, I respectfully 11:28 52 multiple projects, including an analysing to do with the work that you do at Uber? 11:28 53 MR, EHRLICH: And Counsel, can I just make a 11:30 64 decline to answer. And I assert the rights guaranteed 1 li-28 65 the advice and direction of my counsel, I respectfully 11:28 66 the LHc can answer those questions 1 li-30 67 You don't have to answer - you don't have to 11:30 68 the United States. 11:28 99 MR, PERLSON: Q. And, does the work that you do at Uber? 11:28 110 just described, while you were at Berkeley, have 11:28 111 anything to do with the work that you do at Uber? 11:28 112 A On the advice and direction of my counsel, I 11:28 113 respectfully decline to answer. And I assert the 11:30 114 rights guaranteed to me under the Fifth Amendment of 11:28 115 the Constitution of the United States. 11:28 116 Q And, does the work that you do at Uber? 11:28 117 cause you to be knowledgeable as to the state of 11:28 118 self-driving car technology today? 11:28 119 pioneers in the field in terms of building 11:28 119 pioneers in the field in terms of building 11:28 120 THE WITNESS: Yeah, I was one of the first 11:28 121 pioneers in the field in terms of building 11:28 122 a first 21 guaranteed to me under the Fifth Amendment of 11:31 113 Pioneers in the field in terms of building 11:28 115 the Constitution of the United States. 11:31 115 the Constitution of		
20 multiple projects, including navigation of vehicles, 11:27 21 self-driving vehicles built on — using Java for 11:27 22 navigation, using cameras, GPS, and other sensors, 11:27 23 too. 11:28 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber-— Berkeley have 11:28 26 navigation to the work that you did at Google? 11:28 27 a On the — 11:28 28 A On the — 11:28 29 MR. EHRLICH: PII instruct you — 11:28 30 MR. EHRLICH: PII instruct you — 11:28 40 THE WITNESS: — advice of — on the — on 11:28 41 the United States. 11:30 42 to comment? 11:30 43 So, if you are interested in asking questions 11:30 44 about the — the self-driving motorcycle related to 11:30 55 the advice and direction of my counsel, I respectfully 11:28 66 the United States. 11:28 77 to me under the Fifth Amendment of 11:28 88 the United States. 11:28 99 MR. PERLSON: Q. And, does the work that you do at Uber? 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:31 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:30 26 to Comment? 11:30 27 treatly want you to get answers to any 11:30 28 rights. 11:30 29 the Dark PARPA Grand Challenge, I encourage you to ask 11:30 20 the DarkPA Grand Challenge, I encourage you to ask 11:30 21 work that you are doing now at Uber? 11:31 22 work that you are doing now at Uber? 11:31 23 A On the advice and direction of my counsel, I 11:32 24 work that you are doing now at Uber? 11:31 25 the Constitution of the United States. 11:30 26 to Encourse. It is pure to the constitution of the United States. 11:30 27 You don't have to answer. And I assert the 11:30 28 ask him, of course. It's your choice. 11:30 29 MR. PERLSON: Q. How does the work that you did at Berkeley 11:28 30 And the advice and direction of my counsel, I 11:31 31 respectfully decline to answ		
21 self-driving vehicles built on — using Java for 11:27 22 navigation, using cameras, GPS, and other sensors, 11:27 23 too. 11:28 24 MR PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber-—Berkeley have 11:28 26 a On the — 11:28 27 any relation to the work that you did at Google? 11:28 28 MR EHRLICH: Till instruct you — 11:28 30 MR EHRLICH: and counsel, can I just make a 11:30 40 THE WITNESS: — advice of — on the — on 11:28 41 THE WITNESS: — advice of — on the — on 11:28 42 A On the — 11:28 43 THE WITNESS: — advice of — on the — on 11:28 44 THE WITNESS: — advice of — on the — on 11:28 55 the advice and direction of my counsel, I respectfully 11:28 66 decline to answer. And I assert the rights guaranteed 11:28 70 To me under the Fifth Amendment of 11:28 81 the United States. 11:28 91 MR. PERLSON: Q. And, does the work that you do at Uber? 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: And bounsel, an I just make a 11:30 11 questions you can, consistent with his Fifth Amendment I 11:30 1 questions you can, consistent with his Fifth Amendment I 11:30 2 the backroad direction of my counsel, I 11:30 3 So, if you are interested in asking questions 11:30 4 about the — the self-driving motorcycle related to 11:30 5 the Can answer than sking questions 11:30 5 the DARPA Grand Challenge, I encourage you to ask 11:30 9 MR. PERLSON: Q. How does the work that you I 11:30 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:31 12 work that you are doing now at Uber? 11:31 13 respectfully decline to answer. And I asse	-	
22 navigation, using cameras, GPS, and other sensors, 11:28 23 too. 11:28 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber Berkeley have 11:28 26 navigation to the work that you did at Google? 11:28 27 a On the 11:28 28 mR. EHRLICH: Fill instruct you 11:28 29 mR. EHRLICH: Till instruct you 11:28 30 mR. EHRLICH: Till instruct you 11:28 40 mR. PERLSON: Q. And does the work that you 11:28 41 mry relation to the work that you did at Google? 11:28 42 mry relation to the work that you fill as a did incident of the constitution of the united States. 11:30 43 mry relation to the work that you fill at Google? 11:28 44 mry may be the constitution of the United States. 11:30 45 the advice and direction of my counsel, I respectfully 11:28 46 decline to answer. And I assert the rights guaranteed 11:28 47 to me under the Fifth Amendment of the Constitution of 11:28 48 the United States. 11:28 49 mry may be the constitution of the United States. 11:30 50 the advice and direction of my counsel, I 11:30 61 decline to answer. And I assert the rights guaranteed to me under the Fifth Amendment of 11:28 61 decline to answer. And I assert the rights guaranteed 11:28 62 mry may be the United States. 11:30 63 mry perls may be the United States. 11:30 64 decline to answer. And I assert the 11:30 65 decline to answer. And I assert the 11:30 66 decline to answer. And I assert the 11:30 70 mry mry mry mry may be the United States. 11:30 71 to me under the Fifth Amendment of 11:28 71 anything to do with the work that you dot at Uber? 11:28 72 mry		
23 MR. EHRLICH: And Counsel, can Ljust make a 11:30 24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Bers.—Berkeley have 11:28 26 a No the — 11:28 27 A On the — 11:28 28 The advice and direction of my counsel, I respectfully 11:28 3 MR. EHRLICH: FII instruct you — 11:28 4 THE WITNESS: —advice of — on the — on 11:28 5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you dot at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: And Counsel, can Ljust make a 11:30 Page 88 24 comment? 11:30 25 Ireally want you to get answers to any 11:30 Page 88 25 preally want you to get answers to any 11:30 Page 88 26 comment? 11:28 27 ireally want you to get answers to any 11:30 28 rights. 11:30 29 rights. 11:30 3 So, if you are interested in asking questions 11:30 4 about the — the self-driving motorcycle related to 11:30 5 the DARPA Grand Challenge, I encourage you to ask 11:30 6 that. He can answer those questions. 11:30 7 You don't have to answer — you don't have to 11:30 9 MR. PERLSON: Q. How does the work that you 11:28 11 entered the DARPA Challenge in 2004, relate to the 11:31 11 entered the DARPA Challenge in 2004, relate to the 11:31 12 the repectfully decline to answer. And I assert the 11:31 13 respectfully decline to answer. And I assert the 11:31 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the Unite		
24 MR. PERLSON: Q. And does the work that you 11:28 25 just described that you did at Ber Berkeley have 11:28 26 a On the 11:28 27 a On the 11:28 28 Treally want you to get answers to any 11:30 29 A On the 11:28 30 MR. EHRLICH: I'll instruct you 11:28 40 THE WITNESS: advice of on the on 11:28 41 about the the self-driving motorcycle related to 11:30 4 the advice and direction of my counsel, I respectfully 11:28 4 deciline to answer. And I assert the rights guaranteed 11:28 5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:31 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer than 11:28 10 THE WITNESS: Yeah, I was one of the first 11:28 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 the technology that you worked on at Berkeley? 11:29 27 THE WITNESS: On the advice and direction of 11:32 28 THE WITNESS: On the advice and direction of 11:32		
25 just described that you did at Ber Berkeley have 11:28 Page 86 Page 86 Page 86 Page 86 Page 86 Page 86 Page 88 Page 86 Page 86 Page 88 Page 86		, , , , , , , , , , , , , , , , , , ,
Page 86 1 any relation to the work that you did at Google? 11:28 2 A On the 11:28 3 MR. EHRLICH: I'll instruct you 11:28 4 THE WITNESS: advice of on the on 11:28 5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of 11:28 8 the United States. 11:30 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 20 THE WITNESS: Yeah, I was one of the first 11:28 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how - how 11:29 24 does Uber's current self-driving getchnology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 the technology that you worked on at Berkeley? 11:29 27 THE WITNESS: On the advice and direction of 11:32 28 THE WITNESS: On the advice and direction of 11:32 29 THE WITNESS: On the advice and direction of 11:31 20 THE WITNESS: Contact and how - how 11:29 21 gioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:31 23 The going to instruct you to assert you 11:32 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 the technology that you worked on at Berkeley? 11:29 27 THE WITNESS: On the advice and direction of 11:32		
1 any relation to the work that you did at Google? 11:28 2 A On the 11:28 3 MR. EHRLICH: I'll instruct you 11:28 4 THE WITNESS: advice of on the on 11:28 5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the COARDA Challenge in 2004, relate to the 11:31 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 20 THE WITNESS: Yeah, I was one of the first 11:29 21 gioneers in the field in terms of building 11:28 22 the technology that you worked on at Berkeley? 11:29 25 the technology that you worked on at Berkeley? 11:29 25 the technology that you worked on at Berkeley? 11:29 26 the technology that you worked on at Berkeley? 11:29 27 THE WITNESS: On the advice and direction of 11:32 28 THE WITNESS: On the advice and direction of 11:32 29 THE WITNESS: On the advice on direction of 11:32 20 THE WITNESS: On the advice on direction of 11:32 20 THE WITNESS: On the advice on direction of 11:32 21 pioneers in the field in terms of building 11:28 22 the technology that you worked on at Berkeley? 11:29 23 The going to instruct you to assert your 11:32 24 fights. 11:30 25 THE WITNESS: On the advice and direction of 11:32	,	, , ,
2 rights. 11:30 3 MR. EHRLICH: I'll instruct you 11:28 4 THE WITNESS: advice of on the on 11:28 5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 a On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 20 THE WITNESS: Yeah, I was one of the first 11:28 21 giptis. 11:30 3 So, if you are interested in asking questions 11:30 4 about the the self-driving motorcycle related to 11:30 5 the DARPA Grand Challenge, I encourage you to ask 11:30 6 that. He can answer those questions. 11:30 7 You don't have to answer - you don't have to 11:30 8 ask him, of course. It's your choice. 11:30 9 MR. PERLSON: Q. How does the work that you 11:30 10 idd, in relation to the self-driving motorcycle that 11:31 11 entered the DARPA Challenge in 2004, relate to the 11:31 12 work that you are doing now at Uber? 11:31 13 A On the advice and direction of my counsel, I 11:31 14 respectfully decline to answer. And I assert the 11:31 15 the Constitution of the United States. 11:31 16 Q And, does the work that you did at Berkeley 11:28 17 Q What are the advances that have been made at 11:31 18 Uber regarding self-driving motorcycle that 11:31 19 work that you are doing now at Uber? 11:31 10 the Constitution of the United States. 11:31 11 erspectfully decline to answer. And I assert the 11:31 12 Q What		
3 MR. EHRLICH: I'll instruct you 11:28 4 THE WITNESS: advice of on the on 11:28 5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 THE WITNESS: Yeah, I was one of the first 11:28 21 MR. EHRLICH: You can answer that. 11:28 22 MR. PERLSON: Q. And what and how how 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 THE WITNESS: On the advice and direction of 11:32 3 So, if you are interested in asking questions 11:30 4 about the the self-driving motorcycle related to 11:30 4 about the the self-driving motorcycle related to 11:30 5 the DARPA Grand Challenge, I encourage you to ask 11:30 6 that. He can answer those questions. 11:30 7 You don't have to answer you don't have to 11:30 8 ask him, of course. It's pour choice. 11:30 9 MR. PERLSON: Q. How does the work that you 11:30 10 did, in relation to the self-driving motorcycle that you does the work that you 11:30 11:31 12 work that you are interested in asking questions. 11:31 14 respectfully decline to answer you don't have to a liti-31 15 the Constitution of the United States. 11:31 16 the Constitution of the United States. 11:31 17 cause you to be knowledgeable as to the state of 11:28 18 Uber regarding self-drivin		
4 THE WITNESS: advice of on the on 11:28 5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 to the 2004 DARPA Grand Challenge, I encourage you to ask 11:30 11:30 11:30 11:30 11:30 11:30 12 work that you choice. 11:30 13 did, in relation to the self-driving motorcycle that 11:31 14 respectfully decline to answer. And I assert the 11:31 15 the Constitution of the United States. 11:31 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 to the 2004 DARPA Grand Challenge, I encourage you to ask 11:30 11:30 11:30 11:30 11:30 11:30 12 does Uber's current self-driving technology compare to 11:29 13 dring going to instruct you to assert your 11:32 14 rights. 11:31 15 the Constitution of the United States. 11:31 15 the Constitution of the United States. 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 uber regarding self-driving technology over the 11:31 19 self-driving welf-driving technology cover the 11:31 11 anything to do with the work that you did at Berkeley 11:28 11 the constitution of the United States. 11:31 12 anything to do with the work that y		
5 the advice and direction of my counsel, I respectfully 11:28 6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 to the 2004 DARPA Grand Challenge, I encourage you to ask 11:30 11:30 11:30 11:30 11:30 12 You don't have to answer - you don't have to 11:30 13 ask him, of course. It's your choice. 11:30 14 entered the DARPA Challenge in 2004, relate to the 11:31 15 the constitution of the United States. 11:31 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 20 THE WITNESS: Yeah, I was one of the first 11:28 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:31 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32		
6 decline to answer. And I assert the rights guaranteed 11:28 7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 to the 2004 DARPA Grand Challenge? 11:31 12 Wark EHRLICH: Hold on. Let me read the 11:31 12 MR. PERLSON: Q. And what and how how 11:29 13 does Uber's current self-driving technology compare to 11:29 14 does Uber's current self-driving technology compare to 11:29 15 THE WITNESS: On the advice and direction of 11:32 16 that. He can answer those questions. 11:30 11:30 11:30 11:30 11:30 11:30 11:30 11:30 11:30 11:30 11:30 11:30 11:30 11:31 12:30 11:31 12:30 12 work that you are doing now at Uber? 11:31 13 A On the advice and direction of my counsel, I 11:31 14 respectfully decline to answer. And I assert the 11:31 15 rights guaranteed to me under the Fifth Amendment of 11:31 15 the Constitution of the United States. 11:31 15 the Constitution of the United States. 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 Uber regarding self-driving technology over the 11:31 19 self-driving motorcycle that you developed in relation 11:31 20 to the 2004 DARPA Grand Challenge? 11:31 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 question. 11:32 23 I'm going to instruct you to assert your 11:32 24 does Uber's current self-driving technology compare to 11:29 25 THE WITNESS: On the advice and direction of 11:32		
7 to me under the Fifth Amendment of the Constitution of 11:28 8 the United States. 11:28 9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 to the 2004 DARPA Grand Challenge? 11:31 20 THE WITNESS: Yeah, I was one of the first 11:28 21 MR. PERLSON: Q. How does the work that you 11:30 22 the technology that you worked on at Berkeley? 11:28 23 MR. PERLSON: Q. How does the work that you 11:30 24 does Uber's current self-driving motorcycle that 11:31 25 THE WITNESS: On the advice and direction of my counsel, I 11:31 26 THE WITNESS: Q. And what — and how — how 11:29 27 the technology that you worked on at Berkeley? 11:29 28 THE WITNESS: On the advice and direction of 11:32 29 THE WITNESS: On the advice and direction of 11:32 20 THE WITNESS: On the advice and direction of 11:32 20 THE WITNESS: On the advice and direction of 11:32 21 The WITNESS: On the advice and direction of 11:32 22 THE WITNESS: On the advice and direction of 11:32 23 The WITNESS: On the advice and direction of 11:32		
8 the United States. 11:28 8 ask him, of course. It's your choice. 11:30 9 MR. PERLSON: Q. And, does the work that you 11:28 10 did, in relation to the self-driving motorcycle that 11:31 11 anything to do with the work that you do at Uber? 11:28 11 entered the DARPA Challenge in 2004, relate to the 11:31 12 work that you are doing now at Uber? 11:31 13 respectfully decline to answer. And I assert the 11:28 13 A On the advice and direction of my counsel, I 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 15 rights guaranteed to me under the Fifth Amendment of 11:28 16 the Constitution of the United States. 11:31 16 Q And, does the work that you did at Berkeley 11:28 16 the Constitution of the United States. 11:31 17 cause you to be knowledgeable as to the state of 11:28 17 Q What are the advances that have been made at 11:31 18 self-driving car technology today? 11:28 18 Uber regarding self-driving technology over the 11:31 19 MR. EHRLICH: You can answer that. 11:28 19 self-driving motorcycle that you developed in relation 11:31 20 THE WITNESS: Yeah, I was one of the first 11:28 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 self-driving vehicles. 11:29 22 question. 11:31 22 4 does Uber's current self-driving technology compare to 11:29 24 rights. 11:32 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32		1
9 MR. PERLSON: Q. And, does the work that you 11:28 10 just described, while you were at Berkeley, have 11:28 11 anything to do with the work that you do at Uber? 11:28 11 anything to do with the work that you do at Uber? 11:28 11 entered the DARPA Challenge in 2004, relate to the 11:31 12 work that you are doing now at Uber? 11:31 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 did, in relation to the self-driving motorcycle that 11:31 11 entered the DARPA Challenge in 2004, relate to the 11:31 12 work that you are doing now at Uber? 11:31 13 A On the advice and direction of my counsel, I 11:31 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 rights guaranteed to me under the Fifth Amendment of 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 THE WITNESS: On the advice and direction of 11:32	7 to me under the Fifth Amendment of the Constitution of 11:28	7 You don't have to answer you don't have to 11:30
10 just described, while you were at Berkeley, have 11:28 10 did, in relation to the self-driving motorcycle that 11:31 11 anything to do with the work that you do at Uber? 11:28 11 entered the DARPA Challenge in 2004, relate to the 11:31 12 work that you are doing now at Uber? 11:31 13 respectfully decline to answer. And I assert the 11:28 13 A On the advice and direction of my counsel, I 11:31 14 rights guaranteed to me under the Fifth Amendment of 11:28 14 respectfully decline to answer. And I assert the 11:31 15 the Constitution of the United States. 11:28 15 rights guaranteed to me under the Fifth Amendment of 11:31 16 Q And, does the work that you did at Berkeley 11:28 16 the Constitution of the United States. 11:31 17 cause you to be knowledgeable as to the state of 11:28 17 Q What are the advances that have been made at 11:31 18 self-driving car technology today? 11:28 18 Uber regarding self-driving technology over the 11:31 19 MR. EHRLICH: You can answer that. 11:28 19 self-driving motorcycle that you developed in relation 11:31 11:31 128 21 pioneers in the field in terms of building 11:28 22 question. 11:31 22 question. 11:31 23 24 does Uber's current self-driving technology compare to 11:29 24 rights. 11:32 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32	8 the United States. 11:28	8 ask him, of course. It's your choice. 11:30
11 anything to do with the work that you do at Uber? 11:28 12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 THE WITNESS: Yeah, I was one of the first 11:28 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 11 entered the DARPA Challenge in 2004, relate to the 11:31 12 work that you are doing now at Uber? 11:31 12 work that you are doing now at Uber? 11:31 14 respectfully decline to answer. And I assert the 11:31 15 rights guaranteed to me under the Fifth Amendment of 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 Uber regarding self-driving technology over the 11:31 19 MR. EHRLICH: You can answer that. 11:28 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 22 question. 11:31 23 Tm going to instruct you to assert your 11:32 24 does Uber's current self-driving technology compare to 11:29 25 THE WITNESS: On the advice and direction of 11:32	9 MR. PERLSON: Q. And, does the work that you 11:28	9 MR. PERLSON: Q. How does the work that you 11:30
12 A On the advice and direction of my counsel, I 11:28 13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 THE WITNESS: Yeah, I was one of the first 11:28 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:39 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 12 work that you are doing now at Uber? 11:31 13 A On the advice and direction of my counsel, I 11:31 14 respectfully decline to answer. And I assert the 11:31 15 trights guaranteed to me under the Fifth Amendment of 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 Uber regarding self-driving technology over the 11:31 19 self-driving motorcycle that you developed in relation 11:31 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 22 question. 11:31 23 I'm going to instruct you to assert your 11:32 24 rights. 11:32 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32	10 just described, while you were at Berkeley, have 11:28	10 did, in relation to the self-driving motorcycle that 11:31
13 respectfully decline to answer. And I assert the 11:28 14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 THE WITNESS: Yeah, I was one of the first 11:28 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 13 A On the advice and direction of my counsel, I 11:31 14 respectfully decline to answer. And I assert the 11:31 15 rights guaranteed to me under the Fifth Amendment of 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 Uber regarding self-driving technology over the 11:31 19 self-driving motorcycle that you developed in relation 11:31 20 to the 2004 DARPA Grand Challenge? 11:31 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 question. 11:31 23 I'm going to instruct you to assert your 11:32 24 rights. 11:32 25 THE WITNESS: On the advice and direction of 11:32	11 anything to do with the work that you do at Uber? 11:28	11 entered the DARPA Challenge in 2004, relate to the 11:31
14 rights guaranteed to me under the Fifth Amendment of 11:28 15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 THE WITNESS: Yeah, I was one of the first 11:28 11:28 120 THE WITNESS: Yeah, I was one of the first 11:28 131 Tights guaranteed to me under the Fifth Amendment of 11:31 14 respectfully decline to answer. And I assert the 11:31 15 rights guaranteed to me under the Fifth Amendment of 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 Uber regarding self-driving technology over the 11:31 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 THE WITNESS: On the advice and direction of 11:32	12 A On the advice and direction of my counsel, I 11:28	12 work that you are doing now at Uber? 11:31
15 the Constitution of the United States. 11:28 16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 10 THE WITNESS: Yeah, I was one of the first 11:28 20 THE WITNESS: Yeah, I was one of the first 11:28 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 THE WITNESS: On the advice and direction of 11:32 15 rights guaranteed to me under the Fifth Amendment of 11:31 16 the Constitution of the United States. 11:31 17 Q What are the advances that have been made at 11:31 18 Uber regarding self-driving technology over the 11:31 20 to the 2004 DARPA Grand Challenge? 11:31 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 question. 11:31 23 I'm going to instruct you to assert your 11:32 24 rights. 11:32 25 THE WITNESS: On the advice and direction of 11:32	13 respectfully decline to answer. And I assert the 11:28	13 A On the advice and direction of my counsel, I 11:31
16 Q And, does the work that you did at Berkeley 11:28 17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 19 WITNESS: Yeah, I was one of the first 11:28 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 THE WITNESS: On the advice and direction of 11:32	14 rights guaranteed to me under the Fifth Amendment of 11:28	14 respectfully decline to answer. And I assert the 11:31
17 cause you to be knowledgeable as to the state of 11:28 18 self-driving car technology today? 11:28 19 MR. EHRLICH: You can answer that. 11:28 19 velf-driving motorcycle that you developed in relation 11:31 20 THE WITNESS: Yeah, I was one of the first 11:28 21 pioneers in the field in terms of building 11:28 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 What are the advances that have been made at 11:31 27 Uponeers in the advances that have been made at 11:31 28 Uber regarding self-driving technology over the 11:31 29 to the 2004 DARPA Grand Challenge? 11:31 20 TI MR. EHRLICH: Hold on. Let me read the 11:31 21 pioneers in the field in terms of building 11:29 22 question. 11:31 23 Tim going to instruct you to assert your 11:32 24 rights. 11:32 25 THE WITNESS: On the advice and direction of 11:32	15 the Constitution of the United States. 11:28	15 rights guaranteed to me under the Fifth Amendment of 11:31
18 self-driving car technology today? 11:28 18 Uber regarding self-driving technology over the 11:31 19 MR. EHRLICH: You can answer that. 11:28 19 self-driving motorcycle that you developed in relation 11:31 20 THE WITNESS: Yeah, I was one of the first 11:28 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 22 self-driving vehicles. 11:29 23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 18 Uber regarding self-driving technology over the 11:31 19 self-driving motorcycle that you developed in relation 11:31 20 to the 2004 DARPA Grand Challenge? 11:31 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 question. 11:31 23 I'm going to instruct you to assert your 11:32 24 rights. 11:32 25 THE WITNESS: On the advice and direction of 11:32	16 Q And, does the work that you did at Berkeley 11:28	16 the Constitution of the United States. 11:31
19 MR. EHRLICH: You can answer that. 11:28 19 self-driving motorcycle that you developed in relation 11:31 20 THE WITNESS: Yeah, I was one of the first 11:28 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 self-driving vehicles. 11:29 22 question. 11:31 23 MR. PERLSON: Q. And what and how how 11:29 23 I'm going to instruct you to assert your 11:32 24 does Uber's current self-driving technology compare to 11:29 24 rights. 11:32 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32	17 cause you to be knowledgeable as to the state of 11:28	17 Q What are the advances that have been made at 11:31
THE WITNESS: Yeah, I was one of the first 11:28 20 to the 2004 DARPA Grand Challenge? 11:31 21 pioneers in the field in terms of building 11:28 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 self-driving vehicles. 11:29 22 question. 11:31 23 MR. PERLSON: Q. And what and how how 11:29 23 I'm going to instruct you to assert your 11:32 24 does Uber's current self-driving technology compare to 11:29 24 rights. 11:32 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32	18 self-driving car technology today? 11:28	18 Uber regarding self-driving technology over the 11:31
21 pioneers in the field in terms of building 11:28 21 MR. EHRLICH: Hold on. Let me read the 11:31 22 self-driving vehicles. 11:29 22 question. 11:31 23 MR. PERLSON: Q. And what and how how 11:29 23 I'm going to instruct you to assert your 11:32 24 does Uber's current self-driving technology compare to 11:29 24 rights. 11:32 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32	19 MR. EHRLICH: You can answer that. 11:28	19 self-driving motorcycle that you developed in relation 11:31
22 self-driving vehicles. 11:29 22 question. 11:31 23 MR. PERLSON: Q. And what and how how 11:29 23 I'm going to instruct you to assert your 11:32 24 does Uber's current self-driving technology compare to 11:29 24 rights. 11:32 25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32	20 THE WITNESS: Yeah, I was one of the first 11:28	20 to the 2004 DARPA Grand Challenge? 11:31
23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 THE WITNESS: On the advice and direction of 11:32	21 pioneers in the field in terms of building 11:28	21 MR. EHRLICH: Hold on. Let me read the 11:31
23 MR. PERLSON: Q. And what and how how 11:29 24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 THE WITNESS: On the advice and direction of 11:32		
24 does Uber's current self-driving technology compare to 11:29 25 the technology that you worked on at Berkeley? 11:29 26 THE WITNESS: On the advice and direction of 11:32		_
25 the technology that you worked on at Berkeley? 11:29 25 THE WITNESS: On the advice and direction of 11:32		
Page 87	Page 87	Page 89

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 25 of 48 ATTORNEYS EYES ONLY

1 my counsel, I respectfully decline to answer. And I 11:32	1 decline to answer. And I assert the rights guaranteed 11:34
2 assert the rights guaranteed to me under the Fifth 11:32	2 to me under the Fifth Amendment of the Constitution of 11:34
3 Amendment of the Constitution of the United States. 11:32	3 the United States. 11:34
4 MR. PERLSON: Q. What are the differences 11:32	4 Q Have you read the complaint in this case? 11:34
5 between the self-driving car technology that you 11:32	5 A On the advice of my counsel, I respectfully 11:35
6 worked on at Google and the self-driving car 11:32	6 decline to answer. And I assert the rights guaranteed 11:35
7 technology that you currently work on at Uber? 11:32	7 to me under the Fifth Amendment of the Constitution of 11:35
8 A On the advice and direction of my counsel, I 11:32	8 the United States. 11:35
9 respectfully decline to answer. And I assert the 11:32	9 Q Have you read the Waymo's motion for 11:35
10 rights guaranteed to me under the Fifth Amendment of 11:32	10 preliminary injunction in this case? 11:35
11 the Constitution of the United States. 11:32	11 A On the advice and direction of my counsel, I 11:35
12 Q Do you agree that, while you were at Google, 11:32	12 respectfully decline to answer. 11:35
13 Google invested time and money to allow you to develop 11:32	13 Q Can you identify any allegation in Waymo's 11:35
14 self-driving car technology? 11:33	14 complaint that you believe is incorrect? 11:35
15 A On the advice and direction of my counsel, I 11:33	15 A Do you want me to finish my answer to the 11:35
16 respectfully decline to answer. And I assert the 11:33	16 previous one? 11:35
17 rights guaranteed to me under the Fifth Amendment of 11:33	17 MR. EHRLICH: Yeah, go ahead go ahead and 11:35
18 the Constitution of the United States. 11:33	18 answer give the full answer. 11:35
19 Q Do you agree that the development of 11:33	19 THE WITNESS: So, on the previous question, 11:35
20 self-driving car technology at Google took years of 11:33	20 let me just finish 11:35
21 work? 11:33	21 MR. PERLSON: Q. Oh, did I cut you off? 11:35
22 A On the advice and direction of my counsel, I 11:33	22 A Yeah, it's okay. No worries. I'll just 11:35
23 respectfully decline to answer. And I assert the 11:33	23 repeat. 11:35
24 rights guaranteed to me under the Fifth Amendment of 11:33	24 Q I'm not really listening to 11:35
25 the Constitution of the United States. 11:33	25 A I I imagine it's repetitive. 11:35
Page 90	Page 92
1 Q Do you agree that Waymo's self-driving car 11:33	1 But on the advice and direction of my 11:35
2 technology today is a result of years of work and a 11:33	2 counsel, I respectfully decline to answer. And I 11:35
3 substantial investment of time and money? 11:33	3 assert the rights guaranteed to me under the Fifth 11:35
4 A On the advice and direction of my counsel, I 11:33	4 Amendment of the Constitution of the United States. 11:35
4 A On the advice and direction of my counsel, I 11:33 5 respectfully decline to answer. And I assert the 11:33	4 Amendment of the Constitution of the United States. 11:35 5 Okay. Now, this current question? 11:35
-	
5 respectfully decline to answer. And I assert the 11:33	5 Okay. Now, this current question? 11:35
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34 18 your work for Uber? 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36 19 the Constitution of the United States. 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34 18 your work for Uber? 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36 19 the Constitution of the United States. 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34 18 your work for Uber? 11:34 19 A On the advice and direction of my counsel, I 11:34 20 respectfully decline to answer. And I assert the 11:34 21 rights guaranteed to me under the Fifth Amendment of 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36 19 the Constitution of the United States. 11:36 20 Q Isn't it correct that you cannot identify any 11:36 21 allegation or assertion made in any of the 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34 18 your work for Uber? 11:34 19 A On the advice and direction of my counsel, I 11:34 20 respectfully decline to answer. And I assert the 11:34 21 rights guaranteed to me under the Fifth Amendment of 11:34 22 the Constitution of the United States. 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36 19 the Constitution of the United States. 11:36 20 Q Isn't it correct that you cannot identify any 11:36 21 allegation or assertion made in any of the 11:36 22 declarations attached to Google's I'm sorry 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34 18 your work for Uber? 11:34 19 A On the advice and direction of my counsel, I 11:34 20 respectfully decline to answer. And I assert the 11:34 21 rights guaranteed to me under the Fifth Amendment of 11:34 22 the Constitution of the United States. 11:34 23 Q How does your work at Google relate to the 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36 19 the Constitution of the United States. 11:36 20 Q Isn't it correct that you cannot identify any 11:36 21 allegation or assertion made in any of the 11:36 22 declarations attached to Google's I'm sorry 11:36 23 Waymo's motion for a preliminary injunction that is 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34 18 your work for Uber? 11:34 19 A On the advice and direction of my counsel, I 11:34 20 respectfully decline to answer. And I assert the 11:34 21 rights guaranteed to me under the Fifth Amendment of 11:34 22 the Constitution of the United States. 11:34 23 Q How does your work at Google relate to the 11:34 24 allegations in this case? 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36 19 the Constitution of the United States. 11:36 20 Q Isn't it correct that you cannot identify any 11:36 21 allegation or assertion made in any of the 11:36 22 declarations attached to Google's I'm sorry 11:36 23 Waymo's motion for a preliminary injunction that is 11:36 24 incorrect? 11:36
5 respectfully decline to answer. And I assert the 11:33 6 rights guaranteed to me under the Fifth Amendment of 11:33 7 the Constitution of the United States. 11:33 8 Q Do you agree that development of self-driving 11:33 9 car technology, while you were at Google, involved 11:34 10 trial and error? 11:34 11 A On the advice and direction of my counsel, I 11:34 12 respectfully decline to answer. And I assert the 11:34 13 rights guaranteed to me under the Fifth Amendment of 11:34 14 the Constitution of the United States. 11:34 15 Q Isn't it correct that you use the knowledge 11:34 16 you learned through trial and error, while you were 11:34 17 working on self-driving car technology at Google, in 11:34 18 your work for Uber? 11:34 19 A On the advice and direction of my counsel, I 11:34 20 respectfully decline to answer. And I assert the 11:34 21 rights guaranteed to me under the Fifth Amendment of 11:34 22 the Constitution of the United States. 11:34 23 Q How does your work at Google relate to the 11:34	5 Okay. Now, this current question? 11:35 6 Q Let me just repeat it. 11:35 7 A Yes. Thank you. 11:35 8 Q Can you identify any allegation in Waymo's 11:35 9 complaint that you believe is incorrect? 11:35 10 A On the advice and direction of my counsel, I 11:35 11 respectfully decline to answer. And I assert the 11:35 12 rights guaranteed to me under the Fifth Amendment of 11:35 13 the Constitution of the United States. 11:36 14 Q Can you identify any allegation in Waymo's 11:36 15 preliminary injunction motion that is incorrect? 11:36 16 A On the advice and direction of my counsel, I 11:36 17 respectfully decline to answer. And I assert the 11:36 18 rights guaranteed to me under the Fifth Amendment of 11:36 19 the Constitution of the United States. 11:36 20 Q Isn't it correct that you cannot identify any 11:36 21 allegation or assertion made in any of the 11:36 22 declarations attached to Google's I'm sorry 11:36 23 Waymo's motion for a preliminary injunction that is 11:36

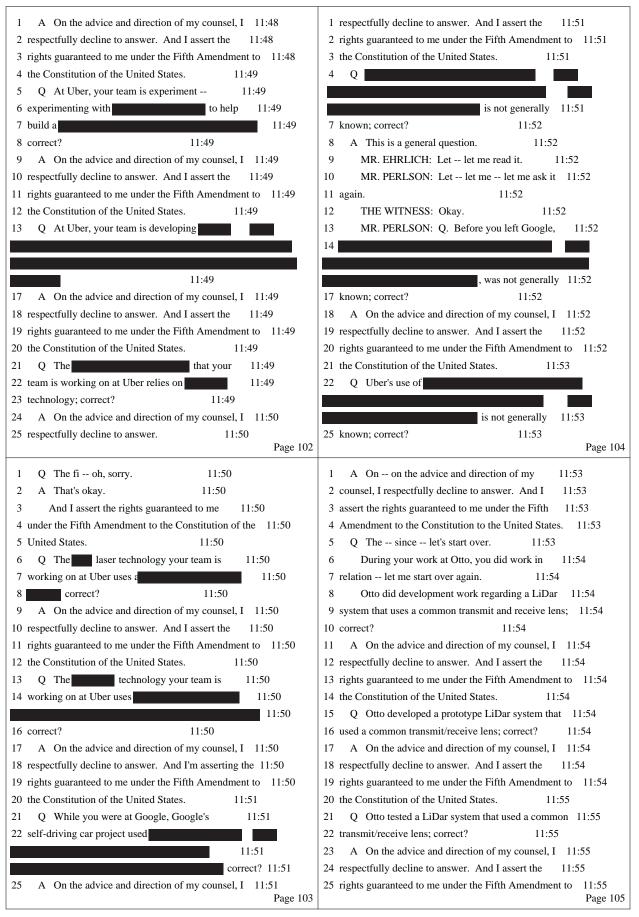
Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 26 of 48 ATTORNEYS EYES ONLY

1 foundation. 11:36	1 of its LiDar system that preceded the Fuji system? 11:39
2 But, I'm going to instruct you to assert your 11:36	2 MS. RAY: Objection; form. 11:39
3 rights. 11:36	3 THE WITNESS: On the advice and direction of 11:39
4 MS. RAY: Join. 11:36	4 my counsel, I respectfully decline to answer. And I 11:39
5 THE WITNESS: On the advice and direction of 11:36	5 assert the rights guaranteed to me under the Fifth 11:39
6 my counsel, I respectfully decline to answer. And I 11:36	6 Amendment of the Constitution of the United States. 11:39
7 assert the rights guaranteed to me under the Fifth 11:36	7 MR. PERLSON: Q. Isn't it true that the 11:39
8 Amendment of the Constitution of the United States. 11:37	8 that Uber's submission in September 2016 of 11:40
9 MR. PERLSON: Q. Have you reviewed any of 11:37	9 regarding its self-driving car technology to the 11:40
10 the declarations attached to Waymo's motion for 11:37	10 Nevada government, referred to a prototype that was 11:40
11 preliminary injunction? 11:37	11 then in existence? 11:40
12 A On the advice and direction of my counsel, I 11:37	12 A On the advice and direction of my counsel, I 11:40
13 respectfully decline to answer. And I assert the 11:37	13 respectfully decline to answer. And I assert the 11:40
14 rights guaranteed to me under the Fifth Amendment of 11:37	14 rights guaranteed to me under the Fifth Amendment of 11:40
15 the Constitution of the United States. 11:37	15 the Constitution of the United States. 11:40
16 Q While at Otto, were you developing technology 11:37	16 Q Did Otto ever use or solicit as a 11:40
17 relating to mid- and long-range LiDar systems? 11:37	17 vendor in developing its technology? 11:40
18 A On the advice and direction of my counsel, I 11:37	18 MS. RAY: Objection; form. 11:40
19 respectfully decline to answer. And I assert the 11:37	19 THE WITNESS: On the advice and direction of 11:40
20 rights guaranteed to me under the Fifth Amendment of 11:37	20 my counsel, I respectfully decline to answer. And I 11:40
21 the Constitution of the United States. 11:37	21 assert the rights guaranteed to me under the Fifth 11:40
22 Q Uber is currently developing long- and 11:37	22 Amendment of the Constitution of the United States. 11:41
23 midrange LiDar systems; correct? 11:37	23 MR. PERLSON: Q. Did Otto ever use or 11:41
24 A On the advice and direction of my counsel, I 11:37	24 solicit a company called as a vendor in developing 11:41
25 respectfully decline to answer. And I assert the 11:37	25 its laser technology? 11:41
Page 94	Page 96
1 rights guaranteed to me under the Fifth Amendment of 11:37	1 MS. RAY: Objection; form. 11:41
2 the Constitution of the United States. 11:38	2 THE WITNESS: I'm sorry. I was distracted. 11:41
2 the Constitution of the United States. 11:38 3 Q Uber's current LiDar development program 11:38	2 THE WITNESS: I'm sorry. I was distracted. 11:41 3 Do you mind repeating it. 11:41
	j l
3 Q Uber's current LiDar development program 11:38	3 Do you mind repeating it. 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38	3 Do you mind repeating it. 11:41 4 MR. PERLSON: Sure. 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38	3 Do you mind repeating it. 11:41 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38	3 Do you mind repeating it. 11:41 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38	3 Do you mind repeating it. 11:41 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39 19 A On the advice and direction of my counsel, I 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41 19 Amendment to the Constitution of the United States. 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39 19 A On the advice and direction of my counsel, I 11:39 20 respectfully decline to answer. And I assert the 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41 19 Amendment to the Constitution of the United States. 11:41 20 MR. PERLSON: Q. Has did Otto select 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39 19 A On the advice and direction of my counsel, I 11:39 20 respectfully decline to answer. And I assert the 11:39 21 rights guaranteed to me under the Fifth Amendment of 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41 19 Amendment to the Constitution of the United States. 11:41 20 MR. PERLSON: Q. Has did Otto select 11:41 21 third-party vendors because of their knowledge of 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39 19 A On the advice and direction of my counsel, I 11:39 20 respectfully decline to answer. And I assert the 11:39 21 rights guaranteed to me under the Fifth Amendment of 11:39 22 the Constitution of the United States. 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41 19 Amendment to the Constitution of the United States. 11:41 20 MR. PERLSON: Q. Has did Otto select 11:41 21 third-party vendors because of their knowledge of 11:41 22 Google's confidential technology? 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39 19 A On the advice and direction of my counsel, I 11:39 20 respectfully decline to answer. And I assert the 11:39 21 rights guaranteed to me under the Fifth Amendment of 11:39 22 the Constitution of the United States. 11:39 23 Q Isn't it true that the in-house technology 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41 19 Amendment to the Constitution of the United States. 11:41 20 MR. PERLSON: Q. Has did Otto select 11:41 21 third-party vendors because of their knowledge of 11:41 22 Google's confidential technology? 11:41 23 A On the advice and direction of my counsel, I 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39 19 A On the advice and direction of my counsel, I 11:39 20 respectfully decline to answer. And I assert the 11:39 21 rights guaranteed to me under the Fifth Amendment of 11:39 22 the Constitution of the United States. 11:39 23 Q Isn't it true that the in-house technology 11:39 24 referred to in Uber's submission to Nevada, regarding 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41 19 Amendment to the Constitution of the United States. 11:41 20 MR. PERLSON: Q. Has did Otto select 11:41 21 third-party vendors because of their knowledge of 11:41 22 Google's confidential technology? 11:41 23 A On the advice and direction of my counsel, I 11:41 24 respectfully decline to answer. And I assert the 11:41
3 Q Uber's current LiDar development program 11:38 4 incorporates technology from Otto's LiDar development 11:38 5 program; correct? 11:38 6 A On the advice and direction of my counsel, I 11:38 7 respectfully decline to answer. And I assert the 11:38 8 rights guaranteed to me under the Fifth Amendment of 11:38 9 the Constitution of the United States. 11:38 10 Q Are you currently participating in Uber's 11:38 11 LiDar work? 11:38 12 A On the advice and direction of my counsel, I 11:38 13 respectfully decline to answer. And I assert the 11:38 14 rights guaranteed to me under the Fifth Amendment of 11:38 15 the Constitution of the United States. 11:38 16 Q Were you involved at all in Uber's regulatory 11:38 17 filing in September of 2016 regarding its self-driving 11:38 18 car technology? 11:39 19 A On the advice and direction of my counsel, I 11:39 20 respectfully decline to answer. And I assert the 11:39 21 rights guaranteed to me under the Fifth Amendment of 11:39 22 the Constitution of the United States. 11:39 23 Q Isn't it true that the in-house technology 11:39	3 Do you mind repeating it. 4 MR. PERLSON: Sure. 11:41 5 Q Did Otto ever use or solicit a company called 11:41 6 as a vendor in developing its laser technology? 11:41 7 MS. RAY: Objection; form. 11:41 8 THE WITNESS: On the advice and direction of 11:41 9 my counsel, I respectfully decline to answer. And I 11:41 10 assert the rights guaranteed to me under the Fifth 11:41 11 Amendment to the Constitution of the United States. 11:41 12 MR. PERLSON: Q. Did Otto ever use or 11:41 13 solicit a company called as a vendor in developing 11:41 14 its laser technology? 11:41 15 MS. RAY: Objection; form. 11:41 16 THE WITNESS: On the advice and direction of 11:41 17 my counsel, I respectfully decline to answer. And I 11:41 18 assert the rights guaranteed to me under the Fifth 11:41 19 Amendment to the Constitution of the United States. 11:41 20 MR. PERLSON: Q. Has did Otto select 11:41 21 third-party vendors because of their knowledge of 11:41 22 Google's confidential technology? 11:41 23 A On the advice and direction of my counsel, I 11:41

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 27 of 48 ATTORNEYS EYES ONLY

1 the Constitution of the United States. 11:41	1 keep going. 11:45
is a supplier for Uber; 11:41	2 MR. PERLSON: I don't care. 11:45
3 correct? 11:42	3 THE WITNESS: Let's do it. 11:45
4 A On the advice and direction of my counsel, I 11:42	4 MR. EHRLICH: Keep going? 11:45
5 respectfully decline to answer. And I assert the 11:42	5 THE WITNESS: Yeah. 11:45
6 rights guaranteed to me under the Fifth Amendment to 11:42	6 MR. PERLSON: The you threw me off, man. 11:45
7 the Constitution of the United States. 11:42	7 MR. EHRLICH: We can take a break, if you 11:45
8 Q On December 12th, 2016, sent 11:42	8 want. 11:45
9 an e-mail to individuals at Uber, that inadvertently 11:42	9 MR. PERLSON: Q. Fuji relates to a LiDar 11:45
10 included a Waymo employee; correct? 11:42	10 system prototype that Uber has developed; correct? 11:45
11 A On the advice and direction of my counsel, I 11:42	11 A On the advice and direction of my counsel, I 11:45
12 respectfully decline to answer. And I assert the 11:42	12 respectfully decline to answer. And I assert the 11:45
13 rights guaranteed to me under the Fifth Amendment to 11:42	13 rights guaranteed to me under the Fifth Amendment to 11:45
14 the Uni to the Constitution of the United States. 11:42	14 the Constitution of the United States. 11:46
15 Q And that e-mail the the December 13th, 11:42	15 Q Work started on Fuji in October 2016; 11:46
16 2016, e-mail included a board that is 11:43	16 correct? 11:46
17 developing for Uber; correct? 11:43	17 A On the advice and direction of my counsel, I 11:46
18 A On the advice and direction of my counsel, I 11:43	18 respectfully decline to answer. And I assert the 11:46
19 respectfully decline to answer. And I assert the 11:43	19 rights guaranteed to me under the Fifth Amendment to 11:46
20 rights guaranteed to me under the Fifth Amendment to 11:43	20 the Constitution of the United States. 11:46
21 the Constitution of the United States. 11:43	21 Q You personally are involved in the 11:46
Q And that December 13, 2016, e-mail attached a 11:43	22 development of Fuji; correct? 11:46
23 board design that was derived from information you 11:43	23 A On the advice and direction of my counsel, I 11:46
24 took from Google before you left Google; correct? 11:43	24 respectfully decline to answer. And I assert the 11:46
25 A On the advice and direction of my counsel, I 11:43	25 rights guaranteed to me under the Fifth Amendment to 11:46
Page 98	Page 100
1 respectfully decline to answer. And I assert the 11:43	1 the to the Constitution of the United States. 11:46
2 rights granted to me guaranteed to me under the 11:43	2 Q Would you agree with me that the following 11:46
3 Fifth Amendment to the to the Constitution of the 11:43	3 statement is incorrect: 11:46
4 United States. 11:44	4 "Anthony Levandowski has never had nor 11:46
5 Q And that 2 and the December 13, 2016, 11:44	5 currently has any design input in the number of 11:46
e-mail attached a board design that used 11:44	6 number of number of 11:46
7 information that was contained in the 14,000 documents 11:44	7 or and of the 11:47
8 you downloaded from Google in December 15 11:44	8 on the transmit PCBs for Fuji." 11:47
9 December 2015; correct? 11:44	9 MR. EHRLICH: Hold on. Let me read that 11:47
10 A On the advice and direction of my counsel, I 11:44	10 question. 11:47
11 respectfully decline to answer. And I assert the 11:44	11 I instruct you to assert your rights. 11:47
12 rights guaranteed to me under the Fifth Amendment to 11:44	12 THE WITNESS: On the advice and direction of 11:47
13 the Constitution of the United States. 11:44	13 my counsel, I respectfully decline to answer. And I 11:47
14 Q Uber would not have been able to have 11:44	14 assert the rights guaranteed to me under the Fifth 11:47
15 developed the board design attached to the 11:44	15 Amendment to the Constitution of the United States. 11:47
16 December 13, 2016, e-mail without using 11:44	16 MR. PERLSON: Q. Is it correct that the 11:47
17 information contained in the 14,000 documents you 11:45	17 current Fuji system borrows technology from each of 11:47
18 downloaded from Google in 2 December 2015; correct? 11:45	18 Otto, Tyto, and Odin Wave? 11:47
19 A On the advice and direction of my counsel, I 11:45	19 A On the advice and direction of my counsel, I 11:48
20 respectfully decline to answer. And I assert the 11:45	20 respectfully decline to answer. And I assert the 11:48
21 rights guaranteed to me under the Fifth Amendment to 11:45	21 rights guaranteed to me under the Fifth Amendment to 11:48
	22 the Constitution of the United States. 11:48
23 MR. EHRLICH: Do you need a break? 11:45 24 THE WITNESS: I'm okay. 11:45	
•	24 experimenting with ; is that 11:48
25 MR. EHRLICH: Do you need a break? We can 11:45 Page 99	25 correct? 11:48 Page 101
1 age //	l age 10

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 28 of 48 ATTORNEYS EYES ONLY



Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 29 of 48 ATTORNEYS EYES ONLY

1 the Constitution of the United States. 11:55	1 of patent infringement? 11:59
2 Q If a LiDar system that uses a common 11:55	2 MS. RAY: Objection; form. 11:59
3 transmit/receive lens does not presently exist at 11:55	3 THE WITNESS: On the advice and direction of 11:59
4 Uber, it is because it was destroyed; correct? 11:55	4 my counsel, I respectfully decline to answer. And I 11:59
5 A On the advice and direction of my counsel, I 11:56	5 assert the rights guaranteed to me under the Fifth 11:59
6 respectfully decline to answer. And I assert the 11:56	6 Amendment to the Constitution of the United States. 11:59
7 rights guaranteed to me under the Fifth Amendment to 11:56	7 MR. PERLSON: Q. Management at Uber 11:59
8 the Constitution of the United States. 11:56	8 instructed you and Otto employees to destroy 11:59
9 Q While at Uber let me start over again. 11:56	9 prototypes to hide the existence of trade secret 11:59
Since your employment with Google ended, you 11:56	10 misappropriation? 11:59
11 have done work on LiDar systems at Otto and Uber where 11:56	11 MS. RAY: Objection; form. 11:59
12 the transmit and receive paths overlap 11:56	THE WITNESS: On the advice and direction of 11:59
13 MS. RAY: Objection; form. 11:56	13 my counsel, I respectfully decline to answer. And I 11:59
14 MR. PERLSON: Q correct? 11:56	14 assert the rights guaranteed to me under the Fifth 11:59
15 A On the advice and direction of my counsel, I 11:56	15 Amendment to the Constitution of the United States. 11:59
16 respectfully decline to answer. And I assert the 11:56	MR. PERLSON: Q. When you were employed by 11:59
17 rights guaranteed to me under the Fifth Amendment to 11:56	17 Google, you had a duty to keep Google confidential 11:59
18 the Uni to the Constitution of the United States. 11:57	18 information secret; correct? 12:00
19 Q Since your employment with Google ended, you 11:57	19 A On the advice and direction of my counsel, I 12:00
20 have done work on LiDar systems at Otto and Uber, 11:57	20 respectfully decline to answer. And I assert the 12:00
21 where the transmit and receive paths overlap and 11:57	21 rights guaranteed to me under the Fifth Amendment to 12:00
22 prototypes of such a system existed? 11:57	22 the Constitution of the United States. 12:00
23 MS. RAY: Objection; form. 11:57	23 Q You understood that were you to disclose 12:00
24 THE WITNESS: On the advice and direction of 11:57	24 confidential and proprietary information of Google to 12:00
25 my counsel, I respectfully decline to answer. And I 11:57	25 those outside of Google without Google's permission, 12:00
Page 106	Page 108
1 assert the rights guaranteed to me under the Fifth 11:57	1 that that would be a breach of your duty of loyalty as 12:00
2 Amendment to the Constitution of the United States. 11:57	2 an employee to Google? 12:00
3 MR. PERLSON: Q. If a prototype of work you 11:57	3 A On the advice and direction of my counsel, I 12:00
4 did on LiDar systems at Otto, and Uber where the 11:57	4 respectfully decline to answer. And I assert the 12:00
5 transmit and receive paths overlap does not exist, it 11:57	5 rights guaranteed to me under the Fifth Amendment to 12:00
6 is because such a prototype has been destroyed? 11:58	6 the Constitution of the United States. 12:00
7 A On the advice and direction of my counsel, I 11:58	7 Q And, despite that understanding of the duty 12:00
8 respectfully decline to answer. And I assert the 11:58	8 to keep confidential, confidential and proprietary 12:00
9 rights guaranteed to me under the Fifth Amendment to 11:58	9 information of Google, you took such confidential and 12:01
10 the Constitution of the United States. 11:58	10 proprietary information with you to your work at Otto 12:01
11 Q Any destruction of any Otto prototypes would 11:58	11 and Uber? 12:01
12 have been done at the instruction of Uber; correct? 11:58	12 A On the advice and direction of my counsel, I 12:01
13 A On the advice and direction of my counsel, I 11:58	13 respectfully decline to answer. And I assert the 12:01
14 respectfully decline to answer. And I assert the 11:58	14 rights guaranteed to me under the Fifth Amendment to 12:01
15 rights guaranteed to me under the Fifth Amendment to 11:58	15 the Constitution of the United States. 12:01
16 the Constitution of the United States. 11:58	16 Q And the taking of that information was done 12:01
17 Q There has been instruction from management at 11:58	17 at the direction and with knowledge of Uber 12:01
18 Uber to you to destroy prototypes that existed and 11:58	18 management; correct? 12:01
19 were designed at Uber? 11:58	19 A On the advice and direction of my counsel, I 12:01
20 A On the advice and direction of my counsel, I 11:58	
	20 respectfully decline to answer. And I assert the 12:01
21 respectfully decline to answer. And I assert the 11:58	20 respectfully decline to answer. And I assert the 12:01 21 rights guaranteed to me under the Fifth Amendment to 12:01
21 respectfully decline to answer. And I assert the 11:58	21 rights guaranteed to me under the Fifth Amendment to 12:01 22 the Constitution of the United States. 12:01 23 Q And you continue to use that confidential and 12:01
21 respectfully decline to answer. And I assert the 11:58 22 rights guaranteed to me under the Fifth Amendment to 11:58 23 the Constitution of the United States. 11:59 24 Q Management at Uber instructed you and Otto 11:59	21 rights guaranteed to me under the Fifth Amendment to 12:01 22 the Constitution of the United States. 12:01 23 Q And you continue to use that confidential and 12:01 24 proprietary information that you took from Google at 12:01
21 respectfully decline to answer. And I assert the 11:58 22 rights guaranteed to me under the Fifth Amendment to 11:58 23 the Constitution of the United States. 11:59	21 rights guaranteed to me under the Fifth Amendment to 12:01 22 the Constitution of the United States. 12:01 23 Q And you continue to use that confidential and 12:01

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 30 of 48 ATTORNEYS EYES ONLY

1 A On the advice and direction of my counsel, I 12:02	1 A On the advice and direction of my counsel, I 13:07
2 respectfully decline to answer. And I assert the 12:02	2 respectfully decline to answer. And I assert the 13:07
3 rights guaranteed to me under the Fifth Amendment to 12:02	3 rights guaranteed to me under the Fifth Amendment 13:07
4 the United States to the Constitution of the 12:02	4 Q You did not 13:07
5 United States. 12:02	5 A to the Constitution of the United States. 13:08
6 Q And that use of confidential and proprietary 12:02	6 Q Sorry. 13:08
7 information that you took from Google is at the 12:02	7 A Sorry. I apologize. 13:08
8 direction of and with the knowledge of Uber 12:02	8 Q You did not disclose to Google your 13:08
9 management? 12:02	9 involvement with 510 Systems and Anthony's Robots 13:08
10 A On the advice and direction of my counsel, I 12:02	10 before Google discovered your involvement with them; 13:08
11 respectfully decline to answer. And I assert the 12:02	11 correct? 13:08
12 rights guaranteed to me under the Fifth Amendment of 12:02	12 A On the advice and direction of my counsel, I 13:08
13 the Constitution of the United States. 12:02	13 respectfully decline to answer. And I assert the 13:08
14 MR. PERLSON: Why don't we take a break. 12:02	14 rights guaranteed to me under the Fifth Amendment to 13:08
15 MR. EHRLICH: Okay. 12:02	15 the Constitution of the United States. 13:08
16 THE VIDEOGRAPHER: Going off the record. The 12:02	16 Q When Google discovered that you were involved 13:08
17 time is 12:02. 12:02	17 in 510 Systems and Anthony's Robots, it thought it 13:08
17 time is 12:02. 12:02 18 (Lunch break taken at 12:02 p.m.) 12:02	17 in 510 Systems and Anthony's Robots, it thought it 15:06 18 was concerned about potential conflicts; correct? 13:08
• •	-
	•
20	20 respectfully decline to answer. And I assert the 13:08
21	21 rights guaranteed to me under the Fifth Amendment to 13:08
22	22 the Constitution of the United States. 13:08
23	23 Q And, given Google's concerns regarding the 13:08
24	24 conflict, you entered into a side agreement with 13:09
25 Page 110	25 Google regarding 510 Systems and Anthony's Robots? 13:09 Page 112
	.0.
1 AFTERNOON SESSION 12:13	1 A On the advice and direction of my counsel, I 13:09
I.	
2 1:06 P.M. 12:13	2 respectfully decline to answer. And I assert the 13:09
2 1:06 P.M. 12:13 3 12:13	2 respectfully decline to answer. And I assert the 13:09 3 rights guaranteed to me under the Fifth Amendment to 13:09
3 12:13	3 rights guaranteed to me under the Fifth Amendment to 13:09
3 12:13 4 12:13	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07 18 company called Anthony's Robots LLC; correct? 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10 18 answer. And I assert the rights guaranteed to me 13:10
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07 18 company called Anthony's Robots LLC; correct? 13:07 19 A On the advice of and direction of my 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10 18 answer. And I assert the rights guaranteed to me 13:10 19 under the Fifth Amendment to the Constitution to the 13:10
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07 18 company called Anthony's Robots LLC; correct? 13:07 19 A On the advice of and direction of my 13:07 20 counsel, I respectfully decline to answer. And I 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10 18 answer. And I assert the rights guaranteed to me 13:10 19 under the Fifth Amendment to the Constitution to the 13:10 20 United States. 13:10
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07 18 company called Anthony's Robots LLC; correct? 13:07 19 A On the advice of and direction of my 13:07 20 counsel, I respectfully decline to answer. And I 13:07 21 assert the rights guaranteed to me under the Fifth 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10 18 answer. And I assert the rights guaranteed to me 13:10 19 under the Fifth Amendment to the Constitution to the 13:10 20 United States. 13:10
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07 18 company called Anthony's Robots LLC; correct? 13:07 19 A On the advice of and direction of my 13:07 20 counsel, I respectfully decline to answer. And I 13:07 21 assert the rights guaranteed to me under the Fifth 13:07 22 Amendment to the Constitution of the United States. 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10 18 answer. And I assert the rights guaranteed to me 13:10 19 under the Fifth Amendment to the Constitution to the 13:10 20 United States. 13:10 21 Q You used confidential information from Google 13:10 22 to help develop technology at 510 Systems; correct? 13:10
12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07 18 company called Anthony's Robots LLC; correct? 13:07 19 A On the advice of and direction of my 13:07 20 counsel, I respectfully decline to answer. And I 13:07 21 assert the rights guaranteed to me under the Fifth 13:07 22 Amendment to the Constitution of the United States. 13:07 23 Q And your employment with Google overlapped 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10 18 answer. And I assert the rights guaranteed to me 13:10 19 under the Fifth Amendment to the Constitution to the 13:10 20 United States. 13:10 21 Q You used confidential information from Google 13:10 22 to help develop technology at 510 Systems; correct? 13:10 23 A On the advice and direction of my counsel, I 13:10
3 12:13 4 12:13 5 THE VIDEOGRAPHER: We are back on the record. 12:29 6 The time is 1:06. 13:06 7 MR. PERLSON: Q. Mr. Levandowski, while you 13:07 8 were employed at Google, you started a company called 13:07 9 510 Systems; correct? 13:07 10 A On the advice and direction of my counsel, I 13:07 11 respectfully decline to answer. 13:07 12 Q While you were at Google 13:07 13 A Oh, wait. Sorry. My microphone fell off. 13:07 14 And I assert the rights guaranteed to me 13:07 15 under the Fifth Amendment to the Constitution of the 13:07 16 United States. 13:07 17 Q While you were at Google, you started a 13:07 18 company called Anthony's Robots LLC; correct? 13:07 19 A On the advice of and direction of my 13:07 20 counsel, I respectfully decline to answer. And I 13:07 21 assert the rights guaranteed to me under the Fifth 13:07 22 Amendment to the Constitution of the United States. 13:07 23 Q And your employment with Google overlapped 13:07 24 with your involvement with 510 Systems and Anthony's 13:07	3 rights guaranteed to me under the Fifth Amendment to 13:09 4 the Constitution of the United States. 13:09 5 Q And 510 Systems was doing work on 13:09 6 self-driving car technology between 2009 and 2011; 13:09 7 correct? 13:09 8 A On the advice and direction of my counsel, I 13:09 9 respectfully decline to answer. And I assert the 13:09 10 rights guaranteed to me under the Fifth Amendment to 13:09 11 the Constitution of the United States. 13:09 12 Q Given what happened with 510 Systems and 13:09 13 Anthony's Robots, you were aware of Google's concern 13:09 14 with you operating side businesses that related to 13:09 15 your work at Google; correct? 13:10 16 A On the advice of on the advice and 13:10 17 direction of my counsel, I respectfully decline to 13:10 18 answer. And I assert the rights guaranteed to me 13:10 19 under the Fifth Amendment to the Constitution to the 13:10 20 United States. 13:10 21 Q You used confidential information from Google 13:10 22 to help develop technology at 510 Systems; correct? 13:10 23 A On the advice and direction of my counsel, I 13:10 24 respectfully decline to answer. And I assert the 13:10

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 31 of 48 ATTORNEYS EYES ONLY

1 the Constitution of the United States. 13:10	1 A On the advice and direction of my counsel, I 13:14
2 Q You brought Google Street View source code to 13:10	2 respectfully decline to answer. And I assert the 13:14
3 510 Systems in order to	3 rights guaranteed to me under the Fifth Amendment to 13:14
correct? 13:10	4 the Constitution of the United States. 13:14
5 A On the advice and direction of my counsel, I 13:10	5 Q And a still later version of LiDar at Google 13:14
6 respectfully decline to answer. And I assert the 13:10	6 was Grizzly Bear 3; correct? 13:15
7 rights guaranteed to me under the Fifth Amendment to 13:10	7 A On the advice and direction of my counsel, I 13:15
8 the Constitution of the United States. 13:11	8 respectfully decline to answer. And I assert the 13:15
9 Q You misused Google's confidential source code 13:11	9 rights guaranteed to me under the Fifth Amendment to 13:15
10 to help advance 510 Systems' technology; didn't you? 13:11	10 the Constitution of the United States. 13:15
11 A On the advice and direction of my counsel, I 13:11	11 Q And each of the development and the 13:15
12 respectfully decline to answer. And I assert the 13:11	12 development from each of the different versions of 13:15
13 rights guaranteed to me under the Fifth Amendment to 13:11	13 LiDar at Google was a result of significant trial and 13:15
14 the Constitution of the United States. 13:11	14 error work by Google engineers; correct? 13:15
15 Q The Little Bear system at 510 Systems was 13:11	15 A On the advice and direction of my counsel, I 13:15
16 named after a mountain; is that correct? 13:11	16 respectfully decline to answer. And I assert the 13:15
17 A On the advice and direction of my counsel, I 13:11	17 rights guaranteed to me under the Fifth Amendment to 13:15
18 respectfully decline to answer. And I assert the 13:11	18 the Constitution of the United States. 13:15
19 rights guaranteed to me under the Fifth Amendment to 13:11	19 Q And the development of LiDar through Grizzly 13:15
20 the Constitution of the United States. 13:12	20 Bear to Grizzly Bear 2 to Grizzly Bear 3 was the 13:15
21 Q And, while you were at Google, you developed 13:12	21 result of significant investment of time and money by 13:15
22 LiDar systems that were named after mountains; 13:12	22 Google; correct? 13:15
23 correct? 13:12	23 A On the advice and direction of my counsel, I 13:15
24 A On the advice and direction of my counsel, I 13:12	24 respectfully decline to answer. And I assert the 13:15
25 respectfully decline to answer. And I assert the 13:12 Page 114	25 rights guaranteed to me under the Fifth Amendment to 13:15 Page 116
1 rights guaranteed to me under the Fifth Amendment to 13:12	1 the Constitution of the United States. 13:16
2 the Constitution of the United States. 13:12	2 Q You are a named inventor on U.S. Patent 13:16
3 Q And the Fuji system at Uber is named after 13:12	3 Nos. 8,836,922 and 9,285,464; correct? 13:16
4 Mount Fuji; correct? 13:12	4 MR. EHRLICH: Counsel, can I just ask the 13:16
5 A On the advice and direction of my counsel, I 13:12	5 the date of those patent submissions, if that's the 13:16
6 respectfully decline to answer. And I assert the 13:12	6 correct word, just so I can advise my client, if you 13:16
7 rights guaranteed to me under the Fifth Amendment to 13:12	7 know. 13:16
8 the Constitution of the United States. 13:12	8 MR. PERLSON: It was while he was at Google, 13:16
9 Q And the reason that the Fuji system at Uber 13:12	9 if that helps. 13:16
10 is named after Mount Fuji is that it is derived from 13:12	10 MR. EHRLICH: Okay. That helps. 13:16
11 Google technology that was also code named with names 13:13	11 I'm going to advise you 13:16
12 of mountains; correct? 13:13	12 THE WITNESS: Okay. 13:16
13 A On the advice and direction of my counsel, I 13:13	13 MR. EHRLICH: to assert your rights then. 13:16
14 respectfully decline to answer. And I assert the 13:13	14 THE WITNESS: On the advice and direction of 13:16
15 rights guaranteed to me under the Fifth Amendment to 13:13	15 my counsel, I respectfully de decline to answer. 13:16
16 the Constitution of the United States. 13:13	16 And I assert the rights guaranteed to me under the 13:16
17 Q Google had a the first an early version 13:13	17 Fifth Amendment to the Constitution of the United 13:16
18 of LiDar, during your work at Google, was called 13:14	18 States. 13:16
19 Grizzly Bear; correct? 13:14	19 MR. PERLSON: Q. You agree that you assigned 13:16
-,,	
20 A On the advice and direction of my counsel I 13:14	20 all your rights and interests to the in the 13:16
20 A On the advice and direction of my counsel, I 13:14	20 all your rights and interests to the in the 13:16 21 '922 patent and '464 patent to Google? 13:17
21 respectfully decline to answer. And I assert the 13:14	21 '922 patent and '464 patent to Google? 13:17
21 respectfully decline to answer. And I assert the 13:14 22 rights guaranteed to me under the Fifth Amendment to 13:14	21 '922 patent and '464 patent to Google? 13:17 22 A On the advice and direction of my counsel, I 13:17
21 respectfully decline to answer. And I assert the 13:14 22 rights guaranteed to me under the Fifth Amendment to 13:14 23 the Constitution of the United States. 13:14	21 '922 patent and '464 patent to Google? 13:17 22 A On the advice and direction of my counsel, I 13:17 23 respectfully decline to answer. And I assert the 13:17
21 respectfully decline to answer. And I assert the 13:14 22 rights guaranteed to me under the Fifth Amendment to 13:14 23 the Constitution of the United States. 13:14 24 Q And the sec and a later version of 13:14	21 '922 patent and '464 patent to Google? 13:17 22 A On the advice and direction of my counsel, I 13:17 23 respectfully decline to answer. And I assert the 13:17 24 rights guaranteed to me under the Fifth Amendment to 13:17
21 respectfully decline to answer. And I assert the 13:14 22 rights guaranteed to me under the Fifth Amendment to 13:14 23 the Constitution of the United States. 13:14	21 '922 patent and '464 patent to Google? 13:17 22 A On the advice and direction of my counsel, I 13:17 23 respectfully decline to answer. And I assert the 13:17

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 32 of 48 ATTORNEYS EYES ONLY

1 Q You are currently employed at Uber 13:17	1 rights guaranteed to me under the Fifth Amendment to 13:19
2 Technologies, Inc.? 13:17	2 the Constitution of the United States. 13:19
3 MR. EHRLICH: You can answer. 13:17	3 Q You have an equity interest in Uber 13:19
4 THE WITNESS: Yes. 13:17	4 Technologies, Inc.; correct? 13:19
5 MR. PERLSON: Q. Uber is affiliated with 13:17	5 A On the advice of my counsel, I respectively 13:19
6 Ottomoto, LLC and Otto Trucking, LLC? 13:17	6 decline to answer. And I assert the rights guaranteed 13:19
7 MS. RAY: Objection; form. 13:17	7 to me under the Fifth Amendment to the Constitution of 13:19
8 MR. EHRLICH: You can answer. 13:17	8 the United States. 13:19
9 THE WITNESS: Yes. 13:17	9 Q You have an equity interest in Ottomoto, LLC; 13:19
10 MR. PERLSON: Q. You were hired at Uber to 13:17	10 correct? 13:19
11 oversee its self-driving car technology; correct? 13:17	11 A On the advice and direction of my counsel, I 13:19
MR. EHRLICH: I'm going to advise you to 13:17	12 respectfully decline to answer. And I assert the 13:19
13 assert your rights. 13:17	13 rights guaranteed to me under the Fifth Amendment to 13:19
14 THE WITNESS: On the advice and direction of 13:17	14 the Constitution of the United States. 13:20
15 my counsel, I respectfully decline to answer. And I 13:17	15 Q You have an equity interest in Otto Trucking, 13:20
16 assert the rights guaranteed to me under the Fifth 13:17	16 LLC; correct? 13:20
17 Amendment to the Constitution of the United States. 13:18	17 A On the advice and direction of my counsel, I 13:20
17 Amendment to the Constitution of the United States. 13:18 18 MR. PERLSON: I had a streak of 13:18	· · · · · · · · · · · · · · · · · · ·
	18 respectfully decline to answer. And I assert the 13:20
19 two questions. 13:18	19 rights guaranteed to me under the Fifth Amendment to 13:20
20 THE WITNESS: I know. It was keep going. 13:18	20 the Constitution of the United States. 13:20
21 MR. EHRLICH: Very impressive. 13:18	21 Q While you were at Goo at Google, Google 13:20
22 THE WITNESS: It's good. 13:18	22 employees had a duty to keep confidential information 13:20
23 MR. PERLSON: Q. The you agree that, 13:18	23 of Google confidential; correct? 13:20
24 after you joined, Uber continued to develop its 13:18	24 A On the on the advice and direction of my 13:20
25 self-driving car technology; correct? 13:18	25 counsel, I respectfully decline to answer. And I 13:20
Page 118	Page 120
1 A On the advice and direction of my counsel, I 13:18	1 assert the rights guaranteed to me under the Fifth 13:20
2 respectfully decline to answer. And I assert the 13:18	2 Amendment to the Constitution of the United States. 13:20
3 rights guaranteed to me under the Fifth Amendment to 13:18	3 Q While you were at Google, Google required 13:20
4 the Constitution of the United States. 13:18	4 employees to password protect their computers and 13:20
5 Q You agree that you were involved in Uber's 13:18	5 other hardware; correct? 13:20
6 decision-making process to continue developing its 13:18	6 A On the advice and direction of my counsel, I 13:20
7 self-driving car technology; correct? 13:18	7 respectfully decline to answer. And I assert the 13:20
8 A On the advice and direction of my counsel, I 13:18	8 rights guaranteed to me under the Fifth Amendment to 13:20
9 respectfully decline to answer. And I assert the 13:18	9 the Constitution of the United States. 13:21
10 rights guaranteed to me under the Fifth Amendment to 13:18	10 Q While you were at Google, Google's networks 13:21
11 the Constitution of the United States. 13:18	11 and other storage repositories were password 13:21
12 Q You agree that Uber began developing its 13:18	12 protected; correct? 13:21
13 current self-driving car technology around the same 13:19	13 A On the advice and direction of my counsel, I 13:20
14 time you joined Uber; correct? 13:19	14 respectfully decline to answer. And I assert the 13:20
15 MS. RAY: Objection to form. 13:19	15 rights guaranteed to me under the Fifth Amendment to 13:20
16 MR. EHRLICH: You can answer. 13:19	16 the Constitution of the United States. 13:21
17 THE WITNESS: Okay. 13:19	
_	17 Q While you were at Google, Google monitored 13:21 18 use and access to its devices and networks for 13:21
18 On the advice and direction of my counsel, I 13:19	
19 respectfully decline to answer. And I assert the 13:19	19 security purposes; correct? 13:21
20 rights guaranteed to me under the Fifth Amendment to 13:19	20 A On the advice and direction of my counsel, I 13:20
21 the Constitution of the United States. 13:19	21 respectfully decline to answer. And I assert the 13:20
MR. PERLSON: Q. You have a leadership role 13:19	22 rights guaranteed to me under the Fifth Amendment to 13:20
23 at Uber Technologies, Inc.; correct? 13:19	23 the Constitution of the United States. 13:21
24 A On the advice and direction of my counsel, I 13:19	24 Q You understand that, while you were at 13:21
25 respectfully decline to answer. And I assert the Page 119	25 Google, Google maintained security software to prevent 13:21 Page 121

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 33 of 48 ATTORNEYS EYES ONLY

1 unauthorized access; correct? 13:21	1 A On the 13:23
2 A On the advice and direction of my counsel, I 13:20	2 Q correct? 13:24
3 respectfully decline to answer. And I assert the 13:20	3 A On the advice and direction of my counsel, I 13:20
4 rights guaranteed to me under the Fifth Amendment to 13:20	4 respectfully decline to answer. And I assert the 13:20
5 the Constitution of the United States. 13:22	5 rights guaranteed to me under the Fifth Amendment to 13:20
6 Q While you were at Google, Google provided 13:22	6 the Constitution of the United States. 13:24
7 network security training to employees with access to 13:22	7 Q While you were at Google, Google's SVN server 13:24
8 networks? 13:22	8 was limited to only those on a need-to-know basis? 13:24
9 A On the advice and direction of my counsel, I 13:22	9 A On the advice and direction of my counsel, I 13:20
10 respectfully decline to answer. And I assert the 13:22	10 respectfully decline to answer. And I assert the 13:20
11 rights guaranteed to me under the Fifth Amendment to 13:22	11 rights guaranteed to me under the Fifth Amendment to 13:20
12 the Constitution of the United States. 13:22	12 the Constitution of the United States. 13:24
13 Q While you were at Google, Google generally 13:22	13 Q While you were at Google, the SVN server 13:24
14 limited application access and network access 13:22	14 required specialized software to access; correct? 13:24
15 containing sensitive material to users with a need to 13:22	15 A On the advice and direction of my counsel, I 13:20
16 know; correct? 13:22	16 respectfully decline to answer. And I assert the 13:20
17 A On the advice and direction of my counsel, I 13:20	17 rights guaranteed to me under the Fifth Amendment to 13:20
18 respectfully decline to answer. And I assert the 13:20	18 the Constitution of the United States. 13:24
19 rights guaranteed to me under the Fifth Amendment to 13:20	19 Q While you were at Google, Google took 13:24
20 the Constitution of the United States. 13:22	
21 Q While you were at Google, Google had a policy 13:22	20 reasonable measures to protect the secrecy of its SVN 13:24 21 server; correct? 13:24
	22 A On the advice and direction of my counsel, I 13:24
23 networks and digital information; correct? 13:22	23 respectfully decline to answer. And I assert the 13:24
24 A On the advice and direction of my counsel, I 13:20	24 rights guaranteed to me under the Fifth Amendment to 13:24
25 respectfully decline to answer. And I assert the Page 122	25 the Constitution of the United States. 13:24 Page 124
1 rights guaranteed to me under the Fifth Amendment to 13:20	1 Q Do you agree that Google Waymo outside 13:24
1 rights guaranteed to me under the Fifth Amendment to 13:20 2 the Constitution of the United States. 13:22	1 Q Do you agree that Google Waymo outside 13:24 2 vendors were generally required to sign nondisclosure 13:25
2 the Constitution of the United States. 13:22	2 vendors were generally required to sign nondisclosure 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23 19 was password protected? 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25 19 correct? 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23 19 was password protected? 13:23 20 A On the advice and direction of my counsel, I 13:20	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25 19 correct? 13:25 20 A On the advice and direction of my counsel, I 13:20
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23 19 was password protected? 13:23 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 21 respectfully decline to answer. And I assert the 13:20	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25 19 correct? 13:25 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23 19 was password protected? 13:23 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25 19 correct? 13:25 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23 19 was password protected? 13:23 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20 23 the Constitution of the United States. 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25 19 correct? 13:25 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20 23 the Constitution of the United States. 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23 19 was password protected? 13:23 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20 23 the Constitution of the United States. 13:23 24 Q While you were at Google, Google's SVN server 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25 19 correct? 13:25 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20 23 the Constitution of the United States. 13:25 24 Q Dogwood Leasing engages, and has engaged, in 13:25
2 the Constitution of the United States. 13:22 3 Q While you were at Google, Google had a policy 13:22 4 against its employees accessing its digital 13:23 5 information for reasons unrelated to business 13:23 6 activities; correct? 13:23 7 A On the advice and direction of my counsel, I 13:23 8 respectfully decline to answer. And I assert the 13:23 9 rights guaranteed to me under the Fifth Amendment to 13:23 10 the Constitution of the United States. 13:23 11 Q While you were at Google, Google took 13:23 12 reasonable measures to protect the secrecy of its 13:23 13 networks and digital information; correct? 13:23 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:23 18 Q While you were at Google, Google's SVN server 13:23 19 was password protected? 13:23 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20 23 the Constitution of the United States. 13:23	2 vendors were generally required to sign nondisclosure 13:25 3 statements? 13:25 4 MS. RAY: Objection; form. 13:25 5 THE WITNESS: On the advice and direction of 13:25 6 my counsel, I respectfully decline to answer. And I 13:25 7 assert the rights guaranteed to me under the Fifth 13:25 8 Amendment to the Constitution of the United States. 13:25 9 MR. PERLSON: Q. Do you recall the passwords 13:25 10 to any of your Google computers? 13:25 11 A On the advice and direction of my counsel, I 13:20 12 respectfully decline to answer. And I assert the 13:20 13 rights guaranteed to me under the Fifth Amendment to 13:20 14 the Constitution of the United States. 13:25 15 Q You owned a company and still own let me 13:25 16 start over again. 13:25 17 While you were at Google and to this day, you 13:25 18 have an ownership interest in Dogwood Leasing; 13:25 19 correct? 13:25 20 A On the advice and direction of my counsel, I 13:20 21 respectfully decline to answer. And I assert the 13:20 22 rights guaranteed to me under the Fifth Amendment to 13:20 23 the Constitution of the United States. 13:25

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 34 of 48 ATTORNEYS EYES ONLY

1 A On the advice and direction of my counsel, I 13:20	1 respectfully decline to answer. And I assert the 13:20
2 respectfully decline to answer. And I assert the 13:20	2 rights guaranteed to me under the Fifth Amendment to 13:20
3 rights guaranteed to me under the Fifth Amendment to 13:20	3 the Constitution of the United States. 13:28
4 the Constitution of the United States. 13:26	4 Q Were you involved in technology development 13:28
5 Q You employed Asheem Linval at Dogwood Leasing 13:26	5 at Odin Wave? 13:28
6 for self-driving car technology; correct? 13:26	6 A On the advice and direction of my counsel, I 13:20
7 A On the advice and direction of my counsel, I 13:20	7 respectfully decline to answer. And I assert the 13:20
8 respectfully decline to answer. And I assert the 13:20	8 rights guaranteed to me under the Fifth Amendment to 13:20
9 rights guaranteed to me under the Fifth Amendment to 13:20	9 the Constitution of the United States. 13:29
10 the Constitution of the United States. 13:26	10 Q Were you paying individuals to work at 13:29
11 Q You asked Mr. Linval to use confidential 13:26	11 Odin Wave? 13:29
12 information he learned while at Google in connection 13:26	12 A On the advice and direction of my counsel, I 13:29
13 with his work at Dogwood Leasing; correct? 13:26	13 respectfully decline to answer. And I assert the 13:29
14 A On the advice and direction of my counsel, I 13:20	14 rights guaranteed to me under the Fifth Amendment to 13:29
15 respectfully decline to answer. And I assert the 13:20	15 the Constitution of the United States. 13:29
	16 Q Isn't it correct that Odin Wave ordered parts 13:29
16 rights guaranteed to me under the Fifth Amendment to 13:20	_
17 the Constitution of the United States. 13:27	17 from that were similar to parts used by Google in 13:29
18 Q You started Odin Wave while you were still 13:27	18 its own LiDar system? 13:29
19 working at Google? 13:27	19 A On the advice and direction of my counsel, I 13:20
20 A On the advice and direction of my counsel, I 13:20	20 respectfully decline to answer. And I assert the 13:20
21 respectfully decline to answer. And I assert the 13:20	21 rights guaranteed to me under the Fifth Amendment to 13:20
22 rights guaranteed to me under the Fifth Amendment to 13:20	22 the Constitution of the United States. 13:29
23 the Constitution of the United States. 13:27	23 Q In 2013, called Google because it had an 13:29
24 Q You had to move the location of Odin Wave 13:27	24 order from Odin Wave that was so similar to parts used 13:29
25 because you were concerned that Google may find out 13:27 Page 126	25 by Google; correct? 13:29 Page 128
1 age 120	1 age 126
1 about its existence? 13:27	1 A On the advice and direction of my counsel, I 13:20
2 A On the advice and direction of my counsel, I 13:20	2 respectfully decline to answer. And I assert the 13:20
3 respectfully decline to answer. And I assert the 13:20	3 rights guaranteed to me under the Fifth Amendment to 13:20
4 rights guaranteed to me under the Fifth Amendment to 13:20	
	4 the Constitution of the United States. 13:30
5 the Constitution of the United States. 13:27	4 the Constitution of the United States. 13:30 5 Q And, because of this incident, Odin Wave 13:30
5 the Constitution of the United States. 13:27	5 Q And, because of this incident, Odin Wave 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:28	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20 17 rights guaranteed to me under the Fifth Amendment to 13:20
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:28 18 Q Did you have a managerial role at Odin Wave? 13:28	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20 17 rights guaranteed to me under the Fifth Amendment to 13:20 18 the Constitution of the United States. 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:28 18 Q Did you have a managerial role at Odin Wave? 13:28 19 A On the advice and direction of my counsel, I 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20 17 rights guaranteed to me under the Fifth Amendment to 13:20 18 the Constitution of the United States. 13:30 19 Q You isn't it true that you directed 13:30
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:28 18 Q Did you have a managerial role at Odin Wave? 13:28 19 A On the advice and direction of my counsel, I 13:20 20 respectfully dis decline to answer. And I assert 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20 17 rights guaranteed to me under the Fifth Amendment to 13:20 18 the Constitution of the United States. 13:30 19 Q You isn't it true that you directed 13:30 20 Odin Wave to file patent applications on its 13:31
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:28 18 Q Did you have a managerial role at Odin Wave? 13:28 19 A On the advice and direction of my counsel, I 13:20 20 respectfully dis decline to answer. And I assert 13:20 21 the rights guaranteed to me under the Fifth Amendment 13:20	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20 17 rights guaranteed to me under the Fifth Amendment to 13:20 18 the Constitution of the United States. 13:30 19 Q You isn't it true that you directed 13:30 20 Odin Wave to file patent applications on its 13:31 21 technology development that stemmed from Google 13:31
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:28 18 Q Did you have a managerial role at Odin Wave? 13:28 19 A On the advice and direction of my counsel, I 13:20 20 respectfully dis decline to answer. And I assert 13:20 21 the rights guaranteed to me under the Fifth Amendment 13:20 22 to the Constitution of the United States. 13:28	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20 17 rights guaranteed to me under the Fifth Amendment to 13:20 18 the Constitution of the United States. 13:30 19 Q You isn't it true that you directed 13:30 20 Odin Wave to file patent applications on its 13:31 21 technology development that stemmed from Google 13:31 22 confidential information? 13:31
5 the Constitution of the United States. 13:27 6 Q You used Google confidential information at 13:27 7 Odin Wave; correct? 13:27 8 A On the advice and direction of my counsel, I 13:20 9 respectfully decline to answer. And I assert the 13:20 10 rights guaranteed to me under the Fifth Amendment to 13:20 11 the Constitution of the United States. 13:28 12 Q Did you have an ownership interest in 13:28 13 Odin Wave? 13:28 14 A On the advice and direction of my counsel, I 13:20 15 respectfully decline to answer. And I assert the 13:20 16 rights guaranteed to me under the Fifth Amendment to 13:20 17 the Constitution of the United States. 13:28 18 Q Did you have a managerial role at Odin Wave? 13:28 19 A On the advice and direction of my counsel, I 13:20 20 respectfully dis decline to answer. And I assert 13:20 21 the rights guaranteed to me under the Fifth Amendment 13:20 22 to the Constitution of the United States. 13:28 23 Q Were you involved in the day-to-day 13:28	5 Q And, because of this incident, Odin Wave 13:30 6 moved to a different location to get distance from 13:30 7 you; correct? 13:30 8 A On the advice and direction of my counsel, I 13:30 9 respectfully decline to answer. And I assert the 13:30 10 rights the rights guaranteed to me under the Fifth 13:30 11 Amendment to the Constitution of the United States. 13:30 12 Q Isn't it true that you were guiding Google 13:30 13 towards an in-house solution so that you could use 13:30 14 that technology at Odin Wave? 13:30 15 A On the advice and direction of my counsel, I 13:20 16 respectfully decline to answer. And I assert the 13:20 17 rights guaranteed to me under the Fifth Amendment to 13:20 18 the Constitution of the United States. 13:30 19 Q You isn't it true that you directed 13:30 20 Odin Wave to file patent applications on its 13:31 21 technology development that stemmed from Google 13:31 22 confidential information? 13:31 23 A On the advice and direction of my counsel, I 13:20

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 35 of 48 ATTORNEYS EYES ONLY

1 the Constitution of the United States. 13:31	1 A On the advice and direction of my counsel, I 13:20
2 Q Odin Wave renamed itself to Tyto LiDAR; 13:31	2 respectfully decline to answer. And I assert the 13:20
3 correct? 13:31	3 rights granted to me under the Fifth Amendment to the 13:20
4 A On the advice and direction of my counsel, I 13:20	4 Constitution of the United States. 13:33
5 respectfully decline to answer. And I assert the 13:20	5 Q You did not disclose your involvement with 13:33
6 rights guaranteed to me under the Fifth Amendment to 13:20	6 Tyto LiDAR to Google; correct? 13:33
7 the Constitution of the United States. 13:31	7 A On the advice and direction of my counsel, I 13:33
8 Q Odin Wave was renamed to Tyto LiDAR in order 13:31	8 respectfully decline to answer. And I assert the 13:33
9 to conceal your involvement; correct? 13:31	9 rights guaranteed to me under the Fifth Amendment to 13:33
10 A On the advice and direction of my counsel, I 13:20	10 the Constitution of the United States. 13:34
11 respectfully decline to answer. And I assert the 13:20	11 Q And in fact, you joined a Google team that 13:34
12 rights guaranteed to me under the Fifth Amendment to 13:20	12 visited Tyto facilities when
13 the Constitution of the United States. 13:31	and you still did not tell Google that 13:34
14 Q After the name change, Tyto Tyto LiDAR 13:31	14 you had an ownership interest in Tyto? 13:34
15 continued in the same business with the same employees 13:31	
	15 A On the advice and direction of my counsel, I 13:34
	16 respectfully decline to answer. And I assert the 13:34
17 A On the advice and direction of my counsel, I 13:20	17 rights guaranteed to me under the Fifth Amendment to 13:34
18 respectfully decline to answer. And I assert the 13:20	18 the Constitution of the United States. 13:34
19 rights guaranteed to me under the Fifth Amendment to 13:20	19 Q You attempted to influence Google's 13:34
20 the Constitution of the United States. 13:32	20 even 13:34
21 Q You had an ownership interest in Tyto LiDAR; 13:32	21 though you did not disclose that you had an ownership 13:34
22 correct? 13:32	22 interest in Tyto LiDAR; correct? 13:34
23 A On the advice and direction of my counsel, I 13:20	23 A On the advice and direction of my counsel, I 13:33
24 respectfully decline to answer. And I assert the 13:20	24 respectfully decline to answer. And I assert the 13:33
25 rights granted to me under the Fifth Amendment to the 13:20 Page 130	25 rights guaranteed to me under the Fifth Amendment to 13:33 Page 132
1 1130 133	7 100 102
1 Constitution of the United States. 13:32	1 the Constitution of the United States. 13:33
2 Q You had a managerial role at Tyto LiDAR; 13:32	2 Q You were positioning Tyto to
2 Q You had a managerial role at Tyto LiDAR; 13:32 3 correct? 13:32	2 Q You were positioning Tyto to
	2 Q You were positioning Tyto to
3 correct? 13:32	2 Q You were positioning Tyto to correct? 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20	
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20	correct? 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20 19 the Constitution of the United States. 13:33	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35 19 A On the advice and direction of my counsel, I 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20 19 the Constitution of the United States. 13:33 20 Q You used Google start over. 13:33	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35 19 A On the advice and direction of my counsel, I 13:35 20 respectfully decline to answer. And I assert the 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20 19 the Constitution of the United States. 13:33 20 Q You used Google start over. 13:33 21 You used information taken from let me 13:33	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:35 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35 19 A On the advice and direction of my counsel, I 13:35 20 respectfully decline to answer. And I assert the 13:35 21 rights guaranteed to me under the Fifth Amendment to 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20 19 the Constitution of the United States. 13:33 20 Q You used Google start over. 13:33 21 You used information taken from let me 13:33 22 start over. 13:33	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35 19 A On the advice and direction of my counsel, I 13:35 20 respectfully decline to answer. And I assert the 13:35 21 rights guaranteed to me under the Fifth Amendment to 13:35 22 the Constitution of the United States. 13:35
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20 19 the Constitution of the United States. 13:33 20 Q You used Google start over. 13:33 21 You used information taken from let me 13:33 22 start over. 13:33 23 You used confidential information taken from 13:33	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35 19 A On the advice and direction of my counsel, I 13:35 20 respectfully decline to answer. And I assert the 13:35 21 rights guaranteed to me under the Fifth Amendment to 13:35 22 the Constitution of the United States. 13:35 23 Q On April 6, 2016, 280 Systems was re 13:35
3 correct? 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20 19 the Constitution of the United States. 13:33 20 Q You used Google start over. 13:33 21 You used information taken from let me 13:33 22 start over. 13:33 23 You used confidential information taken from 13:33 24 Google in connection with your work at Tyto LiDAR; 13:33	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35 19 A On the advice and direction of my counsel, I 13:35 20 respectfully decline to answer. And I assert the 13:35 21 rights guaranteed to me under the Fifth Amendment to 13:35 22 the Constitution of the United States. 13:35 23 Q On April 6, 2016, 280 Systems was re 13:35 24 renamed Ottomoto, Inc.; correct? 13:36
3 correct? 13:32 4 A On the advice and direction of my counsel, I 13:20 5 respectfully decline to answer. And I assert the 13:20 6 rights guaranteed to me under the Fifth Amendment to 13:20 7 the Constitution of the United States. 13:32 8 Q You were involved in the day-to-day 13:32 9 operations of at Tyto LiDAR; correct? 13:32 10 A On the advice and direction of my counsel, I 13:20 11 respectfully decline to answer. And I assert the 13:20 12 rights granted to me under the Fifth Amendment to the 13:20 13 Constitution of the United States. 13:32 14 Q You were involved in the technology 13:32 15 development at Tyto LiDAR; correct? 13:32 16 A On the advice and direction of my counsel, I 13:20 17 respectfully decline to answer. And I assert the 13:20 18 rights guaranteed to me under the Fifth Amendment to 13:20 19 the Constitution of the United States. 13:33 20 Q You used Google start over. 13:33 21 You used information taken from let me 13:33 22 start over. 13:33 23 You used confidential information taken from 13:33	correct? 13:35 6 A On the advice and direction of my counsel, I 13:33 7 respectfully decline to answer. And I assert the 13:33 8 rights guaranteed to me under the Fifth Amendment to 13:33 9 the Constitution of the United States. 13:35 10 Q You registered a domain name for 280 Systems 13:35 11 in November 2015; correct? 13:35 12 A On the advice and direction of my counsel, I 13:33 13 respectfully decline to answer. And I assert the 13:33 14 rights guaranteed to me under the Fifth Amendment to 13:33 15 the Constitution of the United States. 13:35 16 Q On February 11th, 2016, the corporation 13:35 17 restated its name and stock as 280 Systems, Inc.; 13:35 18 correct? 13:35 19 A On the advice and direction of my counsel, I 13:35 20 respectfully decline to answer. And I assert the 13:35 21 rights guaranteed to me under the Fifth Amendment to 13:35 22 the Constitution of the United States. 13:35 23 Q On April 6, 2016, 280 Systems was re 13:35

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 36 of 48 ATTORNEYS EYES ONLY

Inserted to Establic 25 13-40 13-35 13-40 13-35 13-40 13-35 13-40 13-35 13-40 13-35 13-40 13-36 13		
3 A On the advice and direction of my counsel, I 13-40	1 respectfully decline to answer. And I assert the 13:33	1 marked as Exhibit 25. 13:40
## THE WITNESS: Can we take a break? I just	2 rights guaranteed to me under the Fifth Amendment to 13:33	2 Q Do you recognize this document? 13:40
5 miles 13 miles	3 the Constitution of the United States. 13:36	3 A On the advice and direction of my counsel, I 13:40
6 MR, PERLSON: Yeah. 13:36 7 THE VIDEOGRAPHER: Going off the record. The 13:36 18 min is 13:68. 13:36 9 (Recess taken.) 13:36 10 THE VIDEOGRAPHER: We are back on the record. 13:37 11 The time is 1:37. 13:37 12 MR, PERLSON: Q. Ottomoto acquired Tyto in 13:37 13 May 2016; cornect? 13:41 15 respectfully decline to answer. And I assert the 13:33 15 respectfully decline to me under the Fifth Amendment to 13:33 17 fights guaranteed to me under the Fifth Amendment to 13:33 21 rights guaranteed to me under the Fifth Amendment to 13:33 22 the Constitution of the United States. 13:41 23 Q. Otto acquired Tyto LiDAR; cornect? 13:38 24 A On the advice and direction of my counsel, 1 13:33 25 respectfully decline to answer. And I assert the 13:33 26 respectfully decline to answer. And I assert the 13:33 27 rights guaranteed to me under the Fifth Amendment to 13:43 28 respectfully decline to answer. And I assert the 13:33 39 Q. Otto acquired Tyto LiDAR; cornect? 13:38 30 Q. Otto acquired Tyto LiDAR in anticipation of the Constitution of the United States. 13:41 31 rights guaranteed to me under the Fifth Amendment to 13:43 32 respectfully decline to answer. And I assert the 13:33 33 Q. Otto acquired Tyto LiDAR; cornect? 13:38 34 A mendment to the Constitution of the United States. 13:34 35 rights guaranteed to me under the Fifth Amendment to 13:33 36 respectfully decline to answer. And I assert the 13:33 37 rights guaranteed to me under the Fifth Amendment to 13:41 39 Q. Uber directed Otto to acquire Tyto LiDAR; 13:33 40 Q. Otto acquired Tyto LiDAR; 13:33 41 the Constitution of the United States. 13:34 41 MR SCHMIDT: Yeah. 13:42 42 A On the advice and direction of my counsel, I 13:33 43 trights guaranteed to me under the Fifth Amendment to 13:33 41 rights guaranteed to me under the Fifth Amendment to 13:33 41 rights guaranteed to me under the Fifth Amendment to 13:33 42 respectfully decline to answer. And I assert the 13:33 43 rights guaranteed to me under the Fifth Amendment to 13:33 44 the Constitution of the United States. 1	4 THE WITNESS: Can we take a break? I just 13:36	4 respectfully decline to answer. And I assert the 13:40
7	5 want to fill up my water. 13:36	5 rights guaranteed to me under the Fifth Amendment to 13:40
8 time is 1:36.	6 MR. PERLSON: Yeah. 13:36	6 the Constitution of the United States. 13:41
9 A On the device — on the advice and direction 13:41 10 THE VIDEOGRAPHER: We are back on the record. 13:37 11 The time is 13:7. 13:37 12 MR. PERLSON: Q. Ottomoto acquired Tyto in 13:37 13 May 2016; cornect? 13:37 14 A On the advice and direction of my counsel, I 13:33 15 respectfully decline to answer. And I assert the 13:33 16 rights guaranteed to me under the Fifth Amendment to 13:33 17 rights agranteed to me under the Fifth Amendment to 13:33 18 Q In August 2016 Uber acquired Ottomoto? 13:37 19 A On the advice and direction of my counsel, I 13:33 21 rights guaranteed to me under the Fifth Amendment to 13:33 22 the Constitution of the United States. 13:41 23 Q Otto acquired Tyto LiDAR is anticipation of 2 the Constitution of the United States. 13:42 24 A On the advice and direction of my counsel, I 13:33 25 respectfully decline to answer. And I assert the 13:33 26 respectfully decline to answer. And I assert the 13:33 27 rights agranteed to me under the Fifth Amendment to 2 the Constitution of the United States. 13:42 28 A On the advice and direction of my counsel, I 13:33 39 Q Otto acquired Tyto LiDAR is anticipation of 2 the Constitution of the United States. 13:42 4 MA. On the advice and direction of my counsel, I 13:33 4 the Constitution of the United States. 13:42 5 MR. PERLSON: Do we need to get a magnifying 13:42 7 rights agreed — granted to me under the Fifth Amendment to 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:42 15 vesec You can direction of my counsel, I 13:43 16 confidential information to devolop Tyto LiDARs 13:33 17 rechamber to the Constitution of the United States. 13:42 18 A On the advice and direction of my counsel, I 13:43 19 Q Uber directed Onto acquire Tyto LiDARs 13:33 11 A On the advice and direction of my counsel, I 13:43 11 rights guaranteed to me under the Fifth Amendment to 13	7 THE VIDEOGRAPHER: Going off the record. The 13:36	7 Q You agree that this is a schematic for Uber's 13:41
10	8 time is 1:36. 13:36	8 Fuji board; correct? 13:41
11 The time is 1:37. 13:37 13:37 13 May 2016; correct? 13:37 13 May 2016; correct? 13:37 13 May 2016; correct? 13:37 14 A On the advice and direction of my counsel, I 13:33 15 respectfully decline to answer. And I assert the 13:33 17 the Constitution of the United States. 13:37 18 Q In August 2016 (Dher acquired Ottomoto? 13:37 18 Q In August 2016 (Dher acquired Ottomoto? 13:37 18 May 2016; correct? 13:41	9 (Recess taken.) 13:36	9 A On the device on the advice and direction 13:41
12 MR, PERLSON: Q. Ottomoto acquired Tyto in 13:37 13 May 2016; correct? 13:37 14 Marking on the far left? 13:41 13:41 14 drawing on the far left? 13:41 13:41 14 drawing on the far left? 13:41 13:41 13:41 14 drawing on the far left? 13:41 13:41 13:41 15 may 10 may	THE VIDEOGRAPHER: We are back on the record. 13:37	10 of my counsel, I respectfully decline to answer. And 13:41
13 May 2016; correct? 14 A On the advice and direction of my counsel, I 13:33 15 respectfully decline to answer. And I assert the 13:33 16 rights guaranteed to me under the Fifth Amendment to 13:33 17 the Constitution of the United States. 13:37 18 Q In August 2016 Uber acquired Ottomoto? 13:37 18 Q In August 2016 Uber acquired Ottomoto? 13:37 18 Q In August 2016 Uber acquired Ottomoto? 13:37 18 Q In August 2016 Uber acquired Ottomoto? 13:37 18 Q In August 2016 Uber acquired Ottomoto? 13:37 18 Q In August 2016 Uber acquired Ottomoto? 13:37 19 Q The diodes are correct? 13:41 20 respectfully decline to answer. And I assert the 13:34 21 rights guaranteed to me under the Fifth Amendment to 23:38 22 respectfully decline to answer. And I assert the 13:33 23 Q Otto acquired Tyto LiDAR; and the Constitution of the United States. 13:34 24 A On the advice and direction of my counsel, I 13:33 25 respectfully decline to answer. And I assert the 13:33 26 respectfully decline to answer. And I assert the 13:33 27 rights guaranteed to me under the Fifth Amendment to 13:33 28 Amendment to the Constitution of the United States. 13:39 29 Q Uber directed Otto to acquire Tyto LiDAR; 13:39 21 rights guaranteed to me under the Fifth Amendment to 13:33 21 rights guaranteed to me under the Fifth Amendment to 13:33 22 respectfully decline to answer. And I assert the 13:33 23 rights guaranteed to me under the Fifth Amendment to 13:33 24 the Constitution of the United States. 13:39 25 Q Uber knew that you had been using Google 13:39 26 Q Uber knew that you had been using Google 13:39 27 go An on the advice and direction of my counsel, I 13:43 28 A On the advice and direction of my counsel, I 13:43 29 respectfully decline to answer. And I assert the 13:43 20 rights	11 The time is 1:37.	11 I assert the rights guaranteed to me under the Fifth 13:41
14 A On the advice and direction of my counsel, I 13:33 15 respectfully decline to answer. And I assert the 13:33 16 respectfully decline to answer. And I assert the 13:33 17 rights guaranteed to me under the Fifth Amendment to 13:33 17 rights guaranteed to me under the Fifth Amendment to 13:33 18 Q On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 19 rights guaranteed to me under the Fifth Amendment to 13:33 19 respectfully decline to answer. And I assert the 13:34 19 Q The diodes are 13:41 19 Q The	MR. PERLSON: Q. Ottomoto acquired Tyto in 13:37	12 Amendment to the Constitution of the United States. 13:41
15 respectfully decline to answer. And I assert the 13:33 16 rights guaranteed to me under the Fifth Amendment to 13:33 18 Q In August 2016 Ober acquired Ottomoto? 13:37 19 A On the advice and direction of my counsel, I 13:33 20 respectfully decline to answer. And I assert the 13:33 21 rights guaranteed to me under the Fifth Amendment to 13:33 22 the Constitution of the United States. 13:38 23 Q Otto acquired Tyto LiDAR; correct? 13:38 24 A On the advice and direction of my counsel, I 13:33 25 respectfully decline to answer. And I assert the 13:33 26 Q tho acquired by Uber; correct? 13:34 27 rights guaranteed to me under the Fifth Amendment to 2 the Constitution of the United States. 13:38 28 Amendment to the Constitution of the United States. 13:38 3 Q Otto acquired by Uber; correct? 13:39 4 Otto being acquired by Uber; correct? 13:39 5 A On the advice and direction of my counsel, I 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:38 15 Q Uber directed Onto to acquire Tyto LiDAR; 13:33 15 Q Otto acquired Tyto LiDAR; 13:33 16 confidential information to develop Tyto LiDARs 1 13:33 17 respectfully decline to answer. And I assert the 13:33 18 rights guaranteed to me under the Fifth Amendment to 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDARs 1 13:33 17 respectfully decline to answer. And I assert the 13:43 18 the Constitution of the United S	13 May 2016; correct? 13:37	13 Q Do you see that there are diodes in the 13:41
16 rights guaranteed to me under the Fifth Amendment to 13:33 17 the Constitution of the United States. 13:37 18 Q In August 2016 Uber acquired Ottomoto? 13:37 18 the Constitution of the United States. 13:41 19 A On the advice and direction of my counsel, I 13:33 22 the Constitution of the United States. 13:38 23 Q Otto acquired Tyto LiDAR; and I assert the 13:33 25 respectfully decline to answer. And I assert the 13:33 26 the Constitution of the United States. 13:38 27 rights guaranteed to me under the Fifth Amendment to 13:33 28 Amendment to the Constitution of the United States. 13:38 29 Q the acquired Tyto LiDAR; and I assert the 13:33 20 Q to acquired Tyto LiDAR in anticipation of 10 Q the direction of my counsel, I 13:33 20 Q to acquired Tyto LiDAR in anticipation of 10 Q the directed Otto to acquired Tyto LiDAR; 13:38 33 Q to acquired Tyto LiDAR; 13:38 34 Q to acquired Tyto LiDAR; 13:33 34 Q to acquired Tyto LiDAR; 13:33	14 A On the advice and direction of my counsel, I 13:33	14 drawing on the far left? 13:41
17 the Constitution of the United States. 13:37 18 Q In August 2016 Über acquired Ottomoto? 13:37 19 A On the advice and direction of my counsel, 1 13:33 21 rights guaranteed to me under the Fifth Amendment to 13:33 22 the Constitution of the United States. 13:38 23 Q Otto acquired Tyto LiDAR; correct? 13:41 24 A On the advice and direction of my counsel, 1 13:33 25 respectfully decline to answer. And I assert the 13:33 26 Trights guaranteed to me under the Fifth Amendment to 2 the Constitution of the United States. 13:38 31 Q Otto acquired Tyto LiDAR in anticipation of 2 the Constitution of the United States. 13:38 32 Q Otto acquired Tyto LiDAR in anticipation of 3 glass? 13:42 33 Q Otto acquired Tyto LiDAR in anticipation of 4 Otto being acquired by Über; correct? 13:43 34 Manchment to the Constitution of the United States. 13:38 35 A mendment to the Constitution of fine United States. 13:39 36 Order acquired Tyto LiDAR in anticipation of 13:33 37 rights agreed – granted to me under the Fifth Amendment to 13:33 38 A mendment to the Constitution of fine United States. 13:38 39 Q Uber directed Otto to acquire Tyto LiDAR in 3:33 30 On the advice and direction of my counsel, 1 13:33 31 rights guaranteed to me under the Fifth Amendment to 13:33 31 rights guaranteed to me under the Fifth Amendment to 13:33 31 rights guaranteed to me under the Fifth Amendment to 13:33 31 rights guaranteed to me under the Fifth Amendment to 13:33 31 rights guaranteed to me under the Fifth Amendment to 13:33 31 rights guaranteed to me under the Fifth Amendment to 13:33 31 rights guaranteed to me under the Fifth Amendment to 13:33 31 Q And the advice and direction of my counsel, 1 13:42 32 (Debe Constitution of the United States in 13:42 33 glass? 13:42 34 MR. SCHMIDT: Yeah. 13:42 35 MR. EHRLICH: 1 don't know if it's possible 13:42 36 meask if this way: In - in Uber's Fuji 13:42 37 rights agreed – granted to me under the Fifth Amendment to 13:33 39 rights guaranteed to me under the Fifth Amendment to 13:33 30 rights guaranteed to me un	15 respectfully decline to answer. And I assert the 13:33	15 A On the advice and direction of my counsel, I 13:41
18 Q In August 2016 Uber acquired Ottomoto? 13:37 19 A On the advice and direction of my counsel, I 13:33 20 respectfully decline to answer. And I assert the 13:33 21 rights guaranteed to me under the Fifth Amendment to 13:38 22 the Constitution of the United States. 13:38 23 Q Otto acquired Tyto LiDAR; correct? 13:38 24 A On the advice and direction of my counsel, I 13:38 25 respectfully decline to answer. And I assert the 13:38 26 respectfully decline to answer. And I assert the 13:33 3 Q Otto acquired Tyto LiDAR in anticipation of 4 Otto being acquired by Uber; correct? 13:39 3 Q Otto acquired Tyto LiDAR in anticipation of 6 respectfully decline to answer. And I assert the 13:33 4 Mannedment to the Constitution of the United States. 13:38 5 Q Uber directed Otto to acquire Tyto LiDAR; 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed or grade to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:38 15 Q Was a direction of my counsel, I 13:41 15 Q Uber knew that you had been using Google 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:43 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. ERRLICH: I don't know if it's possible 13:42 26 magnetical to me under the Fifth Amendment to 13:43 27 rights guaranteed to me under the Fifth Amendment to 13:43 28 dide? 13:43 29 Q Uber directed Otto to acquire Tyto LiDAR's 13:33 30 Q And if the —in enext diode down is the 13:43 31 rights guaranteed to me under th	16 rights guaranteed to me under the Fifth Amendment to 13:33	16 respectfully decline to answer. And I assert the 13:41
19 A On the advice and direction of my counsel, I 13:33	17 the Constitution of the United States. 13:37	17 rights guaranteed to me under the Fifth Amendment to 13:41
20 respectfully decline to answer. And I assert the 13:33 21 rights guaranteed to me under the Fifth Amendment to 13:38 22 the Constitution of the United States. 13:38 23 the Constitution of the United States. 13:42 24	18 Q In August 2016 Uber acquired Ottomoto? 13:37	18 the Constitution of the United States. 13:41
21 rights guaranteed to me under the Fifth Amendment to 13:33	19 A On the advice and direction of my counsel, I 13:33	19 Q The diodes are correct? 13:41
22 the Constitution of the United States. 13:38 23 Q Otto acquired Tyto LiDAR; correct? 13:38 24 A On the advice and direction of my counsel, I 13:33 25 respectfully decline to answer. And I assert the Page 134 1 rights guaranteed to me under the Fifth Amendment to 2 the Constitution of the United States. 2 MR. EHRLICH: I don't know if it's possible 13:42 2 MR. EHRLICH: I don't know if it's possible 13:42 2 MR. PERLSON: Do we need to get a magnifying 13:42 3 glass? 13:42 2 MR. PERLSON: Do we need to get a magnifying 13:42 3 glass? 13:42 4 MR. SCHMIDT: Yeah. 13:42 5 MR. PERLSON: Q. Well, let me ask it — let 13:42 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed — granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:39 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDARs 13:39 17 rechnology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 respectfully decline to answer. And I assert the 13:33 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:43 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:43 15 rights guaranteed to me under the Fifth Amendment to 13:33 16 confidential information to develop Tyto LiDARs 13:39 17 rechnology? 13:39 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:33 10 respectfully decline to answer. And I assert the 13:33 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:40 13 quantities of the United States. 13:42 14 MR. Scharling Tyto LiDA	20 respectfully decline to answer. And I assert the 13:33	20 A On the advice and direction of my counsel, I 13:41
23 Q Otto acquired Tyto LiDAR; correct? 13:38 24 A On the advice and direction of my counsel, I 13:33 25 respectfully decline to answer. And I assert the Page 134 1 rights guaranteed to me under the Fifth Amendment to the Constitution of the United States. 3 Q Otto acquired Tyto LiDAR in anticipation of 4 Otto being acquired by Uber; correct? 4 Otto being acquired by Uber; correct? 5 A On the advice and direction of my counsel, I 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed - granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:42 2 MR. PERLSON: Q well, let me ask it let 13:42 6 me ask it this way: In in Uber in Uber's Fuji 13:42 7 board, the diode 13 is the 13:43 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:49 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDARs: 13:39 17 technology? 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 11 state Constitution of the United States. 13:43 11 prights guaranteed to me under the Fifth Amendment to 13:43 11 prights guaranteed to me under the Fifth Amendment to 13:43 11 prights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 quaranteed to me under the Fifth Amendment to 13:43 14 the Constitution of the United States. 13:43 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDARs: 13:39 17 technology? 18 A On the advice and direction of my counsel, I 13:43 19 q The diodes on the board shown on the far left 13:43 10 respectfully decline to answer. And I assert the 13:43 1	21 rights guaranteed to me under the Fifth Amendment to 13:33	21 respectfully decline to answer. And I assert the 13:41
24 A On the advice and direction of my counsel, I 13:33 25 respectfully decline to answer. And I assert the Page 134 26 Page 134 27 Page 136 28 Page 134 29 Page 134 20 MR. EHRLICH: Idon't know if it's possible 13:42 20 MR. PERLSON: Do we need to get a magnifying 13:42 21 MR. PERLSON: Do we need to get a magnifying 13:42 22 MR. PERLSON: Do we need to get a magnifying 13:42 23 MR. PERLSON: Do we need to get a magnifying 13:42 24 MR. PERLSON: Do we need to get a magnifying 13:42 25 MR. PERLSON: Do we need to get a magnifying 13:42 26 magnifying 13:42 27 magnifying 13:42 28 MR. PERLSON: Do we need to get a magnifying 13:42 29 MR. PERLSON: Do we need to get a magnifying 13:42 20 MR. PERLSON: Do we need to get a magnifying 13:42 21 MR. PERLSON: Do we need to get a magnifying 13:42 22 MR. PERLSON: Do we need to get a magnifying 13:42 23 glass? 13:43 24 MR. PERLSON: Do we need to get a magnifying 13:42 25 MR. PERLSON: Do we need to get a magnifying 13:42 26 magnifying 13:42 27 MR. PERLSON: Do we need to get a magnifying 13:42 28 MR. PERLSON: Do we need to get a magnifying 13:42 29 MR. PERLSON: Do we need to get a magnifying 13:42 20 magnifying 13:42 20 MR. PERLSON: Do we need to get a magnifying 13:42 31 glass? 13:42 31 glass? 13:42 31 glass? 13:43 4 MR. PERLSON: Do we need to get a magnifying 13:42 31 glass? 13:42 31 glass? 13:42 31 glass? 13:42 4 MR. PERLSON: Do we need to get a magnifying 13:42 31 glass? 13:43 4 MR. PERLSON: Do we need to get a magnifying 13:42 31 glass? 13:43 4 MR. PERLSON: Do we need to get a magnifying 13:42 3 glass? 13:42 4 MR. PERLSON: Do we need to get a magnifying 13:42 4 MR. PERLSON: Do we need to get a magnifying 13:42 4 MR. PERLSON: Do we need to get a magnifying 13:42 4 MR. PERLSON: Do we need to get a magnifying 13:42 4 MR. PERLSON: Do we need to get a magnifying 13:42 5 MR. PERLSON: Do we need to get a magnifying 13:42 1 to we need to get	22 the Constitution of the United States. 13:38	22 rights guaranteed to me under the Fifth Amendment to 13:41
25 respectfully decline to answer. And I assert the Page 134 1 rights guaranteed to me under the Fifth Amendment to the Constitution of the United States. 3 Q Otto acquired Tyto LiDAR in anticipation of 4 Otto being acquired by Uber; correct? 5 A On the advice and direction of my counsel, I 13:33	23 Q Otto acquired Tyto LiDAR; correct? 13:38	23 the Constitution of the United States. 13:42
Page 134 1 rights guaranteed to me under the Fifth Amendment to 2 the Constitution of the United States. 3 Q Otto acquired Tyto LiDAR in anticipation of 4 Otto being acquired by Uber; correct? 4 Otto being acquired by Uber; correct? 5 A On the advice and direction of my counsel, I 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:33 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:33 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct on the United States. 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 respectfully decline to answer. And I assert the 13:43 17 rights guaranteed to me under the Fifth Amendment to 13:33 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:43 10 correct? 13:49 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:43 13 rights guaranteed to me under the Fifth Amendment to 13:43 14 the Constitution of the United States. 13:43 15 Q The diodes on the board shown on the far left 13:43 16 respectfully decline to answer. And I assert the 13:43 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 20 rights guaranteed to me under the Fi	24 A On the advice and direction of my counsel, I 13:33	24 Q is the diode? 13:42
1 rights guaranteed to me under the Fifth Amendment to 2 the Constitution of the United States. 3 Q Otto acquired Tyto LiDAR in anticipation of 4 Otto being acquired by Uber; correct? 5 A On the advice and direction of my counsel, I 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed — granted to me under the Fifth 13:33 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:33 17 respectfully decline to answer. And I assert the 13:33 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 13:39 11 de Constitution of the United States. 13:40 12 de Ro. PERLSON: Do we need to get a magnifying 13:42 13 dlass? 13:42 14 MR. SCHMIDT: Yeah. 13:42 15 MR. PERLSON: Do we need to get a magnifying 13:42 13:42 13 dlass? 13:42 14 MR. SCHMIDT: Yeah. 13:42 13:42 13 me ask it this way: In — in Uber — in Uber's Fuji 13:42 13:43 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:43 15 rights guaranteed to me under the Fifth Amendment to 13:43 16 confidential information to develop Tyto LiDAR's 13:39 17 rights guaranteed to me under the Fifth Amendment to 13:33 18 the Constitution of the United States. 13:43 19 respectfully decline to answer. And I assert the 13:43 10 respectfully decline to answer. And I assert the 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 q And if the — the next diode down is the 13:43 14 the Constitution of the United States. 13:43 15 q D And if the — the next diode down is the 13:43 16 re	_ *	-
2 the Constitution of the United States. 3 Q Otto acquired Tyto LiDAR in anticipation of 4 Otto being acquired by Uber; correct? 5 A On the advice and direction of my counsel, I 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 18:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 113:49 12 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 18:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 respectfully decline to answer. And I assert the 13:33 11 giths guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:40 13 Q And if the the next diode down is the 13:43 14 the Constitution of the United States. 13:43 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:33 17 technology? 18:39 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 10 are generally less 10:40	Page 134	Page 136
3 glass? 13:42 4 Otto being acquired by Uber; correct? 4 MR. SCHMIDT: Yeah. 13:42 5 A On the advice and direction of my counsel, I 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed granted to me under the Fifth 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:43 13 Q And if the the next diode down is the 13:43 14 the Constitution of my counsel, I 13:33 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 respectfully decline to answer. And I assert the 13:33 10 rights guaranteed to me under the Fifth Amendment to 13:33 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 Q are generally less 13:43 14 the Constitution of the United States. 13:43 15 A On the advice and direction of my counsel, I 13:43 16 respectfully decline to answer. And I assert the 13:43 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 10 rights guaranteed to me under the Fifth Amendment to 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 rights guaranteed to me under the Fifth Amendment t	1 rights guaranteed to me under the Fifth Amendment to	1 to see. You can direct us, Counsel? 13:42
4 Otto being acquired by Uber; correct? 5 A On the advice and direction of my counsel, I 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDARs 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 13:39 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:39 13 q And if the the next diode down is the 13:43 14 the Constitution of my counsel, I 13:33 15 q On the advice and direction of my counsel, I 13:33 16 respectfully decline to answer. And I assert the 13:33 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:40 19 Q The diodes on the board shown on the far left 13:43 20 rights guaranteed to me under the Fifth Amendment to 13:43 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 25 the Constitution of the United States. 13:44	2 the Constitution of the United States.	2 MR. PERLSON: Do we need to get a magnifying 13:42
5 A On the advice and direction of my counsel, I 13:33 6 respectfully decline to answer. And I assert the 13:33 7 rights agreed granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:33 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:49 13 Q And if the the next diode down is the 13:43 14 the Constitution of the United States. 13:39 15 A On the advice and direction of my counsel, I 13:33 16 confidential information to develop Tyto LiDAR's 13:39 17 rights guaranteed to me under the Fifth Amendment to 13:33 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:43 10 respectfully decline to answer. And I assert the 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:43 13 quaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:43 15 Q And if the the next diode down is the 13:43 16 confidential information to develop Tyto LiDAR's 13:39 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 20 rights guaranteed to me under the Fifth Amendment to 13:43 21 the Constitution of the United States. 13:40 22 A On the advice and direction of my cou	3 Q Otto acquired Tyto LiDAR in anticipation of	3 glass? 13:42
6 respectfully decline to answer. And I assert the 13:33 7 rights agreed granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:43 10 rights guaranteed to me under the Fifth Amendment to 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 Q And if the the next diode down is the 13:43 14 the Constitution of the United States. 13:43 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:43 10 rights guaranteed to me under the Fifth Amendment to 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 Q And if the the next diode down is the 13:43 14 the Constitution of the United States. 13:43 15 A On the advice and direction of my counsel, I 13:43 16 respectfully decline to answer. And I assert the 13:43 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 20 are generally less 21	4 Otto being acquired by Uber; correct?	4 MR. SCHMIDT: Yeah. 13:42
7 rights agreed granted to me under the Fifth 13:33 8 Amendment to the Constitution of the United States. 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:43 10 respectfully decline to answer. And I assert the 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:49 13 Q And if the the next diode down is the 13:43 14 I rights guaranteed to me under the Fifth Amendment to 13:43 15 A On the advice and direction of my counsel, I 13:43 16 respectfully decline to answer. And I assert the 13:43 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:40 19 Q The diodes on the board shown on the far left 13:43 20 are generally less 21 The Constitution of the United States. 13:40 22 A On the advice and direction of my counsel, I 13:43 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40	5 A On the advice and direction of my counsel, I 13:33	5 MR. PERLSON: Q. Well, let me ask it let 13:42
8 Amendment to the Constitution of the United States. 13:38 9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 10 correct? 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:43 13 Q And if the the next diode down is the 13:43 14 the Constitution of the United States. 13:43 15 Q Uber knew that you had been using Google 13:39 16 respectfully decline to answer. And I assert the 13:43 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 respectfully decline to answer. And I assert the 13:33 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 Q And if the the next diode down is the 13:43 14 the Constitution of the United States. 13:43 15 Q On the advice and direction of my counsel, I 13:43 16 confidential information to develop Tyto LiDAR's 13:39 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 19 Q The diodes on the board shown on the far left 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:43 12 the Constitution of the United States. 13:43 13 rights guaranteed to me under the Fifth Amendment to 13:43 14 the Constitution of the United States. 13:43 15 Q An on the advice and direction of my counsel, I 13:43 16 rights guaranteed to me unde	6 respectfully decline to answer. And I assert the 13:33	6 me ask it this way: In in Uber in Uber's Fuji 13:42
9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38 10 correct? 13:39 11 A On the advice and direction of my counsel, I 13:33 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 10 respectfully decline to answer. And I assert the 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:43 13 Q And if the the next diode down is the 13:43 14 the Constitution of the United States. 13:43 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 25 the Constitution of the United States. 13:44	7 rights agreed granted to me under the Fifth 13:33	7 board, the diode is the 13:42
10 correct? 13:39 10 respectfully decline to answer. And I assert the 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:39 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:43 10 respectfully decline to answer. And I assert the 13:43 11 rights guaranteed to me under the Fifth Amendment to 13:33 12 the Constitution of the United States. 13:43 14 The Constitution of the United States. 15 A On the advice and direction of my counsel, I 13:43 16 respectfully decline to answer. And I assert the 13:43 17 rights guaranteed to me under the Fifth Amendment to 13:33 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 A On the advice and direction of my counsel, I 13:43 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 the Constitution of the United States. 13:43 25 the Constitution of the United States. 13:43 26 the Constitution of the United States. 13:43 27 trights guaranteed to me under the Fifth Amendment to 13:43 28 are generally less 29 are generally less 20 are generally decline to answer. And I assert the 13:43 29 are generally decline to answer. And I assert the 13:43 20 are generally decline to answer. And I assert the 13:43 20 are generally decline to answer. And I assert the 13:43 20 are generally decline to answer. And I assert the 13:43 21 the Constitution of the United States. 21 the Constitution of the United States. 22 A On the advice and direction of my counsel, I 13:43 23 for identification.) 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 the C	8 Amendment to the Constitution of the United States. 13:38	8 diode? 13:43
11 rights guaranteed to me under the Fifth Amendment to 13:43 12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 Tights guaranteed to me under the Fifth Amendment to 13:43 27 tights guaranteed to me under the Fifth Amendment to 13:43 28 Tights guaranteed to me under the Fifth Amendment to 13:43 29 the Constitution of the United States. 13:40 20 are generally less 20 are generally less 21 are generally less 22 are generally decline to answer. And I assert the 13:43 29 tights guaranteed to me under the Fifth Amendment to 13:43 20 tights guaranteed to me under the Fifth Amendment to 13:43 20 tights guaranteed to me under the Fifth Amendment to 13:43 21 the Constitution of the United States. 13:40 22 A On the advice and direction of my counsel, I 13:43 23 tights guaranteed to me under the Fifth Amendment to 13:43 24 tights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:44	9 Q Uber directed Otto to acquire Tyto LiDAR; 13:38	9 A On the advice and direction of my counsel, I 13:43
12 respectfully decline to answer. And I assert the 13:33 13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 Tights guaranteed to me under the Fifth Amendment to 13:43 27 Tights guaranteed to me under the Fifth Amendment to 13:43 28 Tights guaranteed to me under the Fifth Amendment to 13:43 29 Tights guaranteed to me under the Fifth Amendment to 13:43 20 Tights guaranteed to me under the Fifth Amendment to 13:43 21 Tights guaranteed to me under the Fifth Amendment to 13:43 22 Tights guaranteed to me under the Fifth Amendment to 13:43 23 Tights guaranteed to me under the Fifth Amendment to 13:43 24 Tights guaranteed to me under the Fifth Amendment to 13:43 25 Tights guaranteed to me under the Fifth Amendment to 13:43 26 Tights guaranteed to me under the Fifth Amendment to 13:43 27 Tights guaranteed to me under the Fifth Amendment to 13:43 28 Tights guaranteed to me under the Fifth Amendment to 13:43 29 Tights guaranteed to me under the Fifth Amendment to 13:43 20 Tights guaranteed to me under the Fifth Amendment to 13:43 20 Tights guaranteed to me under the Fifth Amendment to 13:43 21 Tights guaranteed to me under the Fifth Amendment to 13:43 22 Tights guaranteed to me under the Fifth Amendment to 13:43 23 Tights guaranteed to me under the Fifth Amendment to 13:43 24 Tights guaranteed to me under the Fifth Amendment to 13:43	10 correct? 13:39	10 respectfully decline to answer. And I assert the 13:43
13 rights guaranteed to me under the Fifth Amendment to 13:33 14 the Constitution of the United States. 13:39 15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 Tights guaranteed to me under the Fifth Amendment to 13:43 27 the Constitution of the United States. 13:40 28 Tights guaranteed to me under the Fifth Amendment to 13:43 29 Tights guaranteed to me under the Fifth Amendment to 13:43 20 Tights guaranteed to me under the Fifth Amendment to 13:43 21 Tights guaranteed to me under the Fifth Amendment to 13:43 22 Tights guaranteed to me under the Fifth Amendment to 13:43 23 Tights guaranteed to me under the Fifth Amendment to 13:43 24 Tights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:44	11 A On the advice and direction of my counsel, I 13:33	11 rights guaranteed to me under the Fifth Amendment to 13:43
14 the Constitution of the United States. 13:39 14	12 respectfully decline to answer. And I assert the 13:33	12 the Constitution of the United States. 13:43
15 Q Uber knew that you had been using Google 13:39 16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:43 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 Tights guaranteed to me under the Fifth Amendment to 13:43 27 Trights guaranteed to me under the Fifth Amendment to 13:43 28 To not the advice and direction of my counsel, I 13:43 29 Tights guaranteed to me under the Fifth Amendment to 13:43 20 are generally less 13:43 21 Trights guaranteed to me under the Fifth Amendment to 13:43 22 To not the advice and direction of my counsel, I 13:43 23 To not the advice and direction of my counsel, I 13:43 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:40 26 the Constitution of the United States. 13:40 27 To not the advice and direction of my counsel, I 13:43 28 To not the advice and direction of my counsel, I 13:43 29 To not the divide and direction of my counsel, I 13:43 20 To not the United States 13:43 21 Trights guaranteed to me under the Fifth Amendment to 13:43 22 To not the United States 13:40 23 To not the United States 13:40 24 Tights guaranteed to me under the Fifth Amendment to 13:43 25 To not the United States 13:40 26 To not the United States 13:40 27 To not the United States 13:40 28 To not the united States 13:43 29 To not the United States 13:43 20 To not the United States 13:43 20 To not the United States 13:43 21 To not the United States 13:43 22 To not the united States 13:43 23 To not the United States 13:43 24 To not the advice and direction of my counsel, I 13:43 25 To not the United States 13:43 26 To not the United S	13 rights guaranteed to me under the Fifth Amendment to 13:33	13 Q And if the the next diode down is the 13:43
16 confidential information to develop Tyto LiDAR's 13:39 17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:43 19 respectfully decline to answer. And I assert the 13:33 19 respectfully decline to answer. And I assert the 13:33 10 rights guaranteed to me under the Fifth Amendment to 13:33 11 the Constitution of the United States. 13:43 12 (Document marked Exhibit 25 13:40 13:40 14 MS. RAY: May I have a copy? Thank you. 13:40 15 MR. PERLSON: You've been handed what's been 13:40 16 respectfully decline to answer. And I assert the 13:43 17 rights guaranteed to me under the Fifth Amendment to 13:43 18 the Constitution of the United States. 13:43 19 Q The diodes on the board shown on the far left 13:43 20 are generally less 13:43 21 correct? 13:43 22 A On the advice and direction of my counsel, I 13:43 23 respectfully decline to answer. And I assert the 13:43 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:44	14 the Constitution of the United States. 13:39	diode; correct? 13:43
17 technology? 13:39 18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 Tights guaranteed to me under the Fifth Amendment to 13:43 27 Tights guaranteed to me under the Fifth Amendment to 13:43 28 To rights guaranteed to me under the Fifth Amendment to 13:43 29 The diodes on the board shown on the far left 13:43 20 are generally less 13:43 21 To rights guaranteed to me under the Fifth Amendment to 13:43 22 To rights guaranteed to me under the Fifth Amendment to 13:43 23 for identification.) 13:40 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:44	15 Q Uber knew that you had been using Google 13:39	15 A On the advice and direction of my counsel, I 13:43
18 A On the advice and direction of my counsel, I 13:33 19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 The diodes on the board shown on the far left 13:43 27 are generally less 13:43 28 are generally less 13:43 29 are generally less 13:43 20 are generally less 13:43 21 the Constitution of the United States. 13:43 20 are generally less 13:43 21 are generally less 13:43 22 A On the advice and direction of my counsel, I 13:43 23 for identification.) 13:40 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:44	16 confidential information to develop Tyto LiDAR's 13:39	16 respectfully decline to answer. And I assert the 13:43
19 respectfully decline to answer. And I assert the 13:33 20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 The diodes on the board shown on the far left 13:43 27 are generally less 13:43 28 are generally less 13:43 29 are generally less 13:43 20 are generally less 13:43 21 generally less 13:43 22 are generally less 13:43 23 respectfully decline to answer. And I assert the 13:43 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:44	17 technology? 13:39	17 rights guaranteed to me under the Fifth Amendment to 13:43
20 rights guaranteed to me under the Fifth Amendment to 13:33 21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 are generally less 27 correct? 13:43 28 are generally less 29 are generally less 20 are generally less 20 are generally less 20 are generally less 21 correct? 13:43 22 A On the advice and direction of my counsel, I 13:43 23 respectfully decline to answer. And I assert the 13:43 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 the Constitution of the United States. 13:44	18 A On the advice and direction of my counsel, I 13:33	18 the Constitution of the United States. 13:43
21 the Constitution of the United States. 13:40 22 (Document marked Exhibit 25 13:40 23 for identification.) 13:40 24 MS. RAY: May I have a copy? Thank you. 13:40 25 MR. PERLSON: You've been handed what's been 13:40 26 the Constitution of the United States. 13:43 27 correct? 13:43 28 a On the advice and direction of my counsel, I 13:43 29 trights guaranteed to me under the Fifth Amendment to 13:43 20 the Constitution of the United States. 13:44	19 respectfully decline to answer. And I assert the 13:33	19 Q The diodes on the board shown on the far left 13:43
22 (Document marked Exhibit 25 13:40 22 A On the advice and direction of my counsel, I 13:43 23 for identification.) 13:40 23 respectfully decline to answer. And I assert the 13:43 24 MS. RAY: May I have a copy? Thank you. 13:40 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 MR. PERLSON: You've been handed what's been 13:40 25 the Constitution of the United States. 13:44	20 rights guaranteed to me under the Fifth Amendment to 13:33	20 are generally less 13:43
for identification.) 13:40 23 respectfully decline to answer. And I assert the 13:43 24 MS. RAY: May I have a copy? Thank you. 13:40 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 MR. PERLSON: You've been handed what's been 13:40 25 the Constitution of the United States. 13:44	21 the Constitution of the United States. 13:40	21 correct? 13:43
MS. RAY: May I have a copy? Thank you. 13:40 24 rights guaranteed to me under the Fifth Amendment to 13:43 25 MR. PERLSON: You've been handed what's been 13:40 25 the Constitution of the United States. 13:44	22 (Document marked Exhibit 25 13:40	22 A On the advice and direction of my counsel, I 13:43
25 MR. PERLSON: You've been handed what's been 13:40 25 the Constitution of the United States. 13:44	23 for identification.) 13:40	23 respectfully decline to answer. And I assert the 13:43
	24 MS. RAY: May I have a copy? Thank you. 13:40	24 rights guaranteed to me under the Fifth Amendment to 13:43
Page 135 Page 137		
	Page 135	Page 137

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 37 of 48 ATTORNEYS EYES ONLY

1 O The diades on the board 12:44	1 Evhibit 25 without reference to the 14 000 files von 12:47
1 Q The diodes on the board 13:44	1 Exhibit 25, without reference to the 14,000 files you 13:47
2 on the shown on the upper left is 13:44	2 downloaded in December 2015; correct? 13:47
diode from the	3 A On the advice and direction of my counsel, I 13:47
4 A On the advice and direction of my counsel, I 13:44	4 respectfully decline to answer. And I assert the 13:47
5 respectfully decline to answer. And I assert the 13:44	5 rights guaranteed to me under the Fifth Amendment to 13:47
6 rights guaranteed to me under the Fifth Amendment to 13:44	6 the Constitution of the United States. 13:47
7 the Constitution of the United States. 13:44	7 Q Uber is aware that the Fuji board shown on 13:47
8 Q There is a between the 13:44	8 Exhibit 25 has diode that is derived from the 13:47
9 diode from the correct? 13:44	9 confidential information you took from Google to Uber; 13:47
10 A On the advice and direction of my counsel, I 13:44	10 correct? 13:48
11 respectfully decline to answer. And I assert the 13:44	11 MS. RAY: Objection; form. 13:48
12 rights guaranteed to me under the Fifth Amendment to 13:44	12 MR. EHRLICH: You can answer. 13:48
13 the Constitution of the United States. 13:44	THE WITNESS: On the advice and direction of 13:48
14 Q The the diodes as the 13:44	14 my counsel, I respectfully decline to answer. And I 13:48
15 of the diode 13:44	15 assert the rights guaranteed to me under the Fifth 13:48
16 correct? 13:44	16 Amendment to the Constitution of the United States. 13:48
17 A On the advice and direction of my counsel, I 13:44	17 MR. PERLSON: Q.
18 respectfully decline to answer. And I assert the 13:44	that is reflected 13:48
19 rights guaranteed to me under the Fifth Amendment to 13:44	19 in documents you took from Google, including the 13:48
20 the Constitution of the United States. 13:45	20 14,000 files you downloaded in December 2015, is not 13:48
21 Q The diodes on the are more 13:45	21 generally known; correct? 13:48
22 the correct? 13:45	22 A On the advice and direction of my counsel, I 13:48
23 A On the advice and direction of my counsel, I 13:45	23 respectfully decline to answer. And I assert the 13:48
24 respectfully decline to answer. And I assert the 13:45	24 rights guaranteed to me under the Fifth Amendment to 13:48
25 rights guaranteed to me under the Fifth Amendment to 13:45	25 the Constitution of the United States. 13:48
Page 138	Page 140
1 the Constitution of the United States. 13:45	1 Q
1 the Constitution of the United States. 13:45 2 Q The diode shown on the board on the 13:45	1 Q that is reflected in documents you 13:49
2 Q The diode shown on the board on the 13:45	that is reflected in documents you 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46 16 Q Uber would not have been able to have 13:46 17 developed the Fuji board shown on Exhibit 25 without 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49 17 assert the rights guaranteed to me under the Fifth 13:49
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46 16 Q Uber would not have been able to have 13:46 17 developed the Fuji board shown on Exhibit 25 without 13:46 18 using the confidential information learned at Google 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49 17 assert the rights guaranteed to me under the Fifth 13:49 18 Amendment to the Constitution of the United States. 13:50
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46 16 Q Uber would not have been able to have 13:46 17 developed the Fuji board shown on Exhibit 25 without 13:46 18 using the confidential information learned at Google 13:46 19 by you; correct? 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49 17 assert the rights guaranteed to me under the Fifth 13:49 18 Amendment to the Constitution of the United States. 13:50 19 MR. PERLSON: Q. Uber did not independently 13:50 20 develop the diode that is reflected on 13:50
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46 16 Q Uber would not have been able to have 13:46 17 developed the Fuji board shown on Exhibit 25 without 13:46 18 using the confidential information learned at Google 13:46 19 by you; correct? 13:46 20 A On the advice and direction of my counsel, I 13:46 21 respectfully decline to answer. And I assert the 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49 17 assert the rights guaranteed to me under the Fifth 13:49 18 Amendment to the Constitution of the United States. 13:50 19 MR. PERLSON: Q. Uber did not independently 13:50 20 develop the diode that is reflected on 13:50 21 Exhibit 25 in the upper left-hand corner of the first 13:50
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46 16 Q Uber would not have been able to have 13:46 17 developed the Fuji board shown on Exhibit 25 without 13:46 18 using the confidential information learned at Google 13:46 19 by you; correct? 13:46 20 A On the advice and direction of my counsel, I 13:46 21 respectfully decline to answer. And I assert the 13:46 22 rights guaranteed to me under the Fifth Amendment to 13:46	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49 17 assert the rights guaranteed to me under the Fifth 13:49 18 Amendment to the Constitution of the United States. 13:50 19 MR. PERLSON: Q. Uber did not independently 13:50 20 develop the diode that is reflected on 13:50 21 Exhibit 25 in the upper left-hand corner of the first 13:50 22 page, on its own without reference to confidential 13:50
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46 16 Q Uber would not have been able to have 13:46 17 developed the Fuji board shown on Exhibit 25 without 13:46 18 using the confidential information learned at Google 13:46 19 by you; correct? 13:46 20 A On the advice and direction of my counsel, I 13:46 21 respectfully decline to answer. And I assert the 13:46 22 rights guaranteed to me under the Fifth Amendment to 13:46 23 the Constitution of the United States. 13:47	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49 17 assert the rights guaranteed to me under the Fifth 13:49 18 Amendment to the Constitution of the United States. 13:50 19 MR. PERLSON: Q. Uber did not independently 13:50 20 develop the diode that is reflected on 13:50 21 Exhibit 25 in the upper left-hand corner of the first 13:50 22 page, on its own without reference to confidential 13:50 23 information taken from Google; correct? 13:50
2 Q The diode shown on the board on the 13:45 3 far left was derived from correct? 13:45 5 A On the advice and direction of my counsel, I 13:45 6 respectfully decline to answer. And I assert the 13:45 7 rights guaranteed to me under the Fifth Amendment to 13:45 8 the Constitution of the United States. 13:45 9 Q You used the confidential information you 13:45 10 learned at Google to derive the diode shown on 13:46 11 the board, on the upper left in Exhibit 25; correct? 13:46 12 A On the advice and direction of my counsel, I 13:46 13 respectfully decline to answer. And I assert the 13:46 14 rights guaranteed to me under the Fifth Amendment to 13:46 15 the Constitution of the United States. 13:46 16 Q Uber would not have been able to have 13:46 17 developed the Fuji board shown on Exhibit 25 without 13:46 18 using the confidential information learned at Google 13:46 19 by you; correct? 13:46 20 A On the advice and direction of my counsel, I 13:46 21 respectfully decline to answer. And I assert the 13:46 22 rights guaranteed to me under the Fifth Amendment to 13:46 23 the Constitution of the United States. 13:47	that is reflected in documents you 13:49 3 took from Google, including the 14,000 files you 13:49 4 downloaded in December 2015, has independent economic 13:49 5 value because it is not generally known; correct? 13:49 6 A On the advice and direction of my counsel, I 13:49 7 respectfully decline to answer. And I assert the 13:49 8 rights granted to me under the Fifth Amendment to the 13:49 9 Constitution of the United States. 13:49 10 Q The diode that is reflected on 13:49 11 Exhibit 25, that was derived from information taken by 13:49 12 you from Google, reflects the diode that is 13:49 13 not generally known; correct? 13:49 14 MS. RAY: Objection; form. 13:49 15 THE WITNESS: On the advice and direction of 13:49 16 my counsel, I respectfully decline to answer. And I 13:49 17 assert the rights guaranteed to me under the Fifth 13:49 18 Amendment to the Constitution of the United States. 13:50 19 MR. PERLSON: Q. Uber did not independently 13:50 20 develop the diode that is reflected on 13:50 21 Exhibit 25 in the upper left-hand corner of the first 13:50 22 page, on its own without reference to confidential 13:50 23 information taken from Google; correct? 13:50

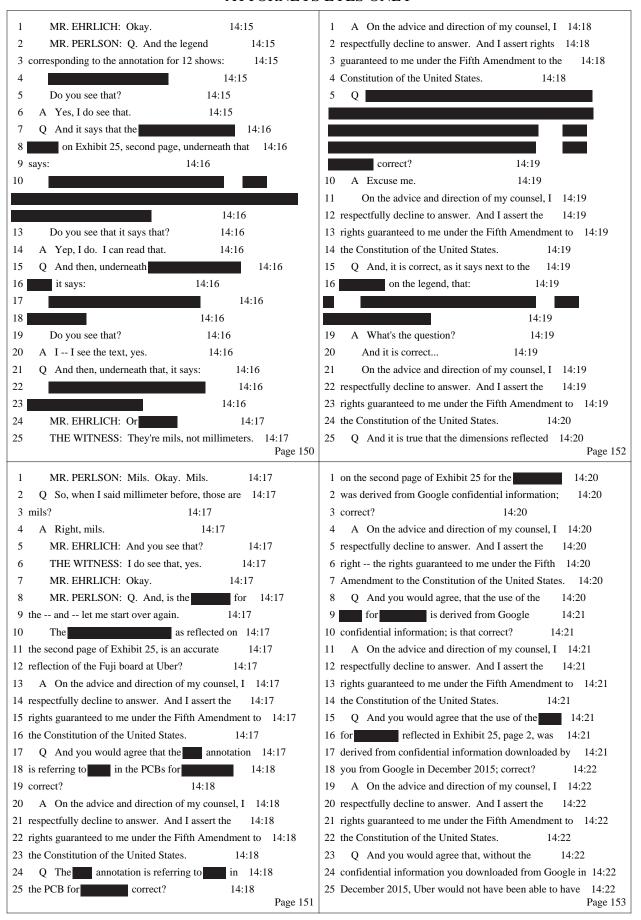
Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 38 of 48 ATTORNEYS EYES ONLY

2 the Constitution of the United States. 13:50 3 Do you want this one back? 13:51 4 Q You can just keep it there. Thanks. 13:51 5 A Okay. 13:51 6 (Document marked Exhibit 26 13:51 7 for identification.) 13:51 8 THE VIDEOGRAPHER: Five more minutes. 13:51	1 respectfully decline to answer. And I assert the 13:54 2 rights guaranteed to me under the Fifth Amendment to 13:54 3 the Constitution of the United States. 13:54 4 Q Uber would not have been able to have 13:55 5 developed the PCB configuration and diode arrangement 13:55 6 shown in Exhibit 26 without reference to Google 13:55
3 Do you want this one back? 13:51 4 Q You can just keep it there. Thanks. 13:51 5 A Okay. 13:51 6 (Document marked Exhibit 26 13:51 7 for identification.) 13:51 8 THE VIDEOGRAPHER: Five more minutes. 13:51	3 the Constitution of the United States. 13:54 4 Q Uber would not have been able to have 13:55 5 developed the PCB configuration and diode arrangement 13:55 6 shown in Exhibit 26 without reference to Google 13:55
4 Q You can just keep it there. Thanks. 13:51 5 A Okay. 13:51 6 (Document marked Exhibit 26 13:51 7 for identification.) 13:51 8 THE VIDEOGRAPHER: Five more minutes. 13:51	4 Q Uber would not have been able to have 13:55 5 developed the PCB configuration and diode arrangement 13:55 6 shown in Exhibit 26 without reference to Google 13:55
5 A Okay. 13:51 6 (Document marked Exhibit 26 13:51 7 for identification.) 13:51 8 THE VIDEOGRAPHER: Five more minutes. 13:51	5 developed the PCB configuration and diode arrangement 13:55 6 shown in Exhibit 26 without reference to Google 13:55
6 (Document marked Exhibit 26 13:51 7 for identification.) 13:51 8 THE VIDEOGRAPHER: Five more minutes. 13:51	6 shown in Exhibit 26 without reference to Google 13:55
7 for identification.) 13:51 8 THE VIDEOGRAPHER: Five more minutes. 13:51	_
8 THE VIDEOGRAPHER: Five more minutes. 13:51	
	7 confidential information taken by you, including 13:55
O MD DEDI GON OI O' 10.71	8 documents downloaded by you in December 2015? 13:55
9 MR. PERLSON: Okay. Okay. 13:51	9 A On the advice and direction of my counsel, I 13:55
10 Q You've been handed what's been marked as 13:51 1	10 respectfully decline to answer. And I assert the 13:55
	1 rights guaranteed to me under the Fifth Amendment to 13:55
	2 the Constitution of the United States. 13:55
	MR. PERLSON: He has to change the tape. 13:55
	THE WITNESS: Okay. 13:55
	THE VIDEOGRAPHER: Okay. We are going off 13:55
	16 the record. The time is 1:55. 13:55
	17 (Recess taken.) 13:55
	18 THE VIDEOGRAPHER: This marks the 13:58
	19 deposition or excuse me. 14:06
	20 This marks the beginning of DVD No. 3 in the 14:06
	21 deposition of Anthony Levandowski. 14:06
	•
	Going back on the record. The time is 2:06. 14:06
	MR. PERLSON: Q. Would you agree that the 14:06
	24 let me start over again. 14:06
25 rights guaranteed to me under the Fifth Amendment to 13:52 Page 142	25 Isn't it correct that the PCB configuration 14:06 Page 144
1 the Constitution of the United States. 13:53	1 and diode arrangement that is reflected in the 14:06
2 Q The PCBs shown on Exhibit 26 are similar 13:53	2 documents you downloaded from Google in 2015, and are 14:06
3 to the PCB drawing we saw in Exhibit 25; correct? 13:53	3 used in the configuration shown at Exhibit 26, are not 14:06
4 A On the advice and direction of my counsel, I 13:53	4 generally known? 14:07
5 respectfully decline to answer. And I assert the 13:53	5 A On the advice and direction of my counsel, I 14:07
6 rights guaranteed to me under under the Fifth 13:53	6 respectfully decline to answer. And I assert the 14:07
7 Amendment to the Constitution of the United States. 13:53	7 rights guaranteed to me under the Fifth Amendment to 14:07
8 Q PCBs on Exhibit 26 show	8 the Constitution of the United States. 14:07
correct? 13:53	9 Q Isn't it correct that the PCB configuration, 14:07
10 A On the advice and direction of my counsel, I 13:53	0 and diode arrangement that is reflected in the 14:07
	1 documents you downloaded from Google in December 2015 14:07
	2 are then are used in configuration let me start 14:07
	13 over again. 14:07
	Isn't it correct that the PCB configuration 14:07
	15 and diode arrangement, that is reflected in the Google 14:07
	14:07 documents you downloaded from Google on December
	17 December 2015, and are used in the configuration shown 14:07
1	18 at Exhibit 26 derive have independent economic 14:08
18 respectfully decline to answer. And I assert the 13:54	19 value by virtue of their not being publicly known? 14:08
19 rights guaranteed to me under the Fifth Amendment to 13:54	
19 rights guaranteed to me under the Fifth Amendment to 13:54 20 the Constitution of the United States. 13:54	20 A On the advice and direction of my counsel, I 14:08
19 rights guaranteed to me under the Fifth Amendment to 13:54 20 the Constitution of the United States. 13:54 21 Q The PCB configuration and diode arrangement 13:54 2	20 A On the advice and direction of my counsel, I 14:08 21 respectfully decline to answer. And I assert the 14:08
19 rights guaranteed to me under the Fifth Amendment to 13:54 20 the Constitution of the United States. 13:54 21 Q The PCB configuration and diode arrangement 13:54 22 shown on Exhibit 26 was developed using Google 13:54	20 A On the advice and direction of my counsel, I 14:08 21 respectfully decline to answer. And I assert the 14:08 22 rights guaranteed to me under the Fifth Amendment to 14:08
19 rights guaranteed to me under the Fifth Amendment to 13:54 20 the Constitution of the United States. 13:54 21 Q The PCB configuration and diode arrangement 13:54 22 shown on Exhibit 26 was developed using Google 13:54 23 confidential information reflected in documents 13:54 2	20 A On the advice and direction of my counsel, I 14:08 21 respectfully decline to answer. And I assert the 14:08 22 rights guaranteed to me under the Fifth Amendment to 14:08 23 the Constitution of the United States. 14:08
19 rights guaranteed to me under the Fifth Amendment to 13:54 20 the Constitution of the United States. 13:54 21 Q The PCB configuration and diode arrangement 13:54 22 shown on Exhibit 26 was developed using Google 13:54 23 confidential information reflected in documents 13:54 24 downloaded by you in December 2015; correct? 13:54 2	20 A On the advice and direction of my counsel, I 14:08 21 respectfully decline to answer. And I assert the 14:08 22 rights guaranteed to me under the Fifth Amendment to 14:08

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 39 of 48 ATTORNEYS EYES ONLY

1 Q For the record, Exhibit 25 is UBER000727. It 14:08	1 diodes, was derived 14:12
2 looked like that got cut off when it was printed. 14:08	2 from Google confidential information reflected among 14:12
3 In the drawing on the far left of Exhibit 25, 14:09	3 the 14,000 documents you downloaded in December 2015? 14:12
4 there are diodes of the 14:09	4 A On the advice and direction of my counsel, I 14:12
5 board. 14:09	5 respectfully decline to answer. And I assert the 14:12
6 Do you see that? 14:09	6 rights guaranteed to me under the Fifth Amendment to 14:12
7 A That's your question? 14:09	7 the Constitution of the United States. 14:12
8 Q Yeah. 14:09	8 Q Isn't it correct that the placement of the 14:12
9 A Okay. 14:09	9 diodes, would not 14:12
On the advice and direction of my counsel, I 14:09	10 have been able to be developed by Uber without use of 14:13
11 respectfully decline to answer. And I assert the 14:09	11 the Google confidential information reflected among 14:13
12 rights guaranteed to me under the Fifth Amendment to 14:09	12 the 14,000 documents you downloaded from Google in 14:13
13 the Constitution of the United States. 14:09	13 December 2015? 14:13
14 Q The diodes shown on the drawing on the far 14:09	14 A On the advice and direction of my counsel, I 14:13
15 left of Exhibit 25 14:09	15 respectfully decline to answer. And I assert the 14:13
16 correct? 14:10	16 rights guaranteed to me under the Fifth Amendment to 14:13
17 A On the advice and direction of my counsel, I 14:10	17 the Constitution of the United States. 14:13
18 respectfully decline to answer. And I assert the 14:10	18 Q Isn't it correct that the placement of the 14:13
19 rights guaranteed to me under the Fifth Amendment to 14:10	19 diodes that is a 14:13
20 the Constitution of the United States. 14:10	20 placement that is not publicly known? 14:13
21 Q You would agree that the the diodes 14:10	21 A On the advice and direction of my counsel, I 14:13
22 in the Fuji board are	22 respectfully decline to answer. And I assert the 14:13
14:10	23 rights guaranteed to me under the Fifth Amendment to 14:13
24 A On the advice and direction of my counsel, I 14:10	24 the Constitution of the United States. 14:14
25 respectfully decline to answer. And I assert the 14:10	25 Q Isn't it correct that the placement of the 14:14
Page 146	Page 148
1 rights guaranteed to me under the Fifth Amendment to 14:10	1 diodes, is a 14:14
2 the Constitution of the United States. 14:10	2 placement that has economic value because it is not 14:14
3 Q You agree that, in the Fuji system, that each 14:10	3 publicly known? 14:14
4 of the diodes have a placed in them? 14:10	4 A On the advice and direction of my counsel, I 14:14
5 A On the advice and direction of my counsel, I 14:10	5 respectfully decline to answer. And I assert the 14:14
6 respectfully decline to answer. And I assert the 14:10	6 rights guaranteed to me under the Fifth Amendment to 14:14
7 rights guaranteed to me under the Fifth Amendment to 14:10	7 the Constitution of the United States. 14:14
8 the Constitution of the United States. 14:11	8 Q If you could please turn to the 14:14
9 Q Isn't it correct that, in the Fuji system, 14:11	9 MR. PERLSON: It's this one; right? 14:14
10 of the diodes have a placed in 14:11	10 MR. SCHMIDT: Yeah. 14:14
11 them? 14:11	11 MR. PERLSON: Q. The second page of 14:14
12 A On the advice and direction of my counsel, I 14:11	12 Exhibit 25. 14:14
13 respectfully decline to answer. And I assert the 14:11	13 A (Witness complies.) 14:14
14 rights guaranteed to me under the Fifth Amendment to 14:11	14 Q Do you see that there are on the 14:14
15 the Constitution of the United States. 14:11	in the middle of the page 14:15
16 Q Isn't it correct that the light emitted from 14:11	16 annotated with a 12? 14:15
17 the diodes is in the Fuji system? 14:11	17 MR. EHRLICH: He's just asking if you see it 14:15
17 the diodes is in the Fuji system? 14:11 18 A On the advice and direction of my counsel, I 14:11	
	17 MR. EHRLICH: He's just asking if you see it 14:15
18 A On the advice and direction of my counsel, I 14:11	17 MR. EHRLICH: He's just asking if you see it 14:15 18 now. You can answer that. Just, do you see 14:15
18 A On the advice and direction of my counsel, I 14:11 19 respectfully decline to answer. And I assert the 14:11	17 MR. EHRLICH: He's just asking if you see it 14:15 18 now. You can answer that. Just, do you see 14:15 19 THE WITNESS: I do see 14:15
18 A On the advice and direction of my counsel, I 14:11 19 respectfully decline to answer. And I assert the 14:11 20 rights guaranteed to me under the Fifth Amendment to 14:11	17 MR. EHRLICH: He's just asking if you see it 14:15 18 now. You can answer that. Just, do you see 14:15 19 THE WITNESS: I do see 14:15 20 MR. EHRLICH: what he's referencing? 14:15
A On the advice and direction of my counsel, I 14:11 19 respectfully decline to answer. And I assert the 14:11 20 rights guaranteed to me under the Fifth Amendment to 14:11 21 the Constitution of the United States. 14:12	17 MR. EHRLICH: He's just asking if you see it 14:15 18 now. You can answer that. Just, do you see 14:15 19 THE WITNESS: I do see 14:15 20 MR. EHRLICH: what he's referencing? 14:15 21 THE WITNESS: I see that he's pointing at 14:15
A On the advice and direction of my counsel, I 14:11 19 respectfully decline to answer. And I assert the 14:11 20 rights guaranteed to me under the Fifth Amendment to 14:11 21 the Constitution of the United States. 14:12 22 Q Isn't it correct that the placement of the 14:12	17 MR. EHRLICH: He's just asking if you see it 14:15 18 now. You can answer that. Just, do you see 14:15 19 THE WITNESS: I do see 14:15 20 MR. EHRLICH: what he's referencing? 14:15 21 THE WITNESS: I see that he's pointing at 14:15 22 14:15
A On the advice and direction of my counsel, I 14:11 19 respectfully decline to answer. And I assert the 14:11 20 rights guaranteed to me under the Fifth Amendment to 14:11 21 the Constitution of the United States. 14:12 22 Q Isn't it correct that the placement of the 14:12 23 diodes, as shown on Exhibit 25 let me start over 14:12	MR. EHRLICH: He's just asking if you see it 14:15 18 now. You can answer that. Just, do you see 14:15 19 THE WITNESS: I do see 14:15 20 MR. EHRLICH: what he's referencing? 14:15 21 THE WITNESS: I see that he's pointing at 14:15 22 14:15 23 MR. EHRLICH: Okay. 14:15

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 40 of 48 ATTORNEYS EYES ONLY



Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 41 of 48 ATTORNEYS EYES ONLY

1 designed a system 14:22	1 information with Uber at your meeting in with Brian 14:25
2 correct? 14:22	2 McClendon in the summer of 2015; correct? 14:25
3 A On the advice and direction of my counsel, I 14:22	3 A On the advice and direction of my counsel, I 14:25
4 respectfully decline to answer. And I assert the 14:22	4 respectfully decline to answer. And I assert the 14:25
5 rights guaranteed to me under the Fifth Amendment to 14:22	5 rights guaranteed to me under the Fifth Amendment to 14:25
6 the Constitution of the United States. 14:22	6 the Constitution of the United States. 14:25
7 Q And you agree that	7 Q By at least January 2016, you understood that 14:25
that was derived from Google's confidential 14:23	8 Uber was already interested in investing or acquiring 14:25
9 information, and reflected in Exhibit 25 on the second 14:23	9 the new company you were finding? 14:26
10 page, is not commonly known? 14:23	10 A On the advice and direction of my counsel, I 14:26
11 A On the advice and direction of my counsel, I 14:23	11 respectfully decline to answer. And I assert the 14:26
12 respectfully decline to answer. And I assert the 14:23	12 rights guaranteed to me under the Fifth Amendment to 14:26
13 rights guaranteed to me under the Fifth Amendment to 14:23	13 the Constitution of the United States. 14:26
14 the Constitution of the United States. 14:23	14 Q You agree that Uber let me start over 14:26
15 Q And, you would agree that	15 again. 14:26
that was derived from Google 14:23	16 You agree that Uber's LiDar lens designs are 14:26
17 confidential information, and reflected in Exhibit 25 14:23	17 derived from Google confidential information that you 14:26
18 on the second page, has economic value because it is 14:23	18 took from Google? 14:26
19 not commonly known? 14:23	19 A On the advice and direction of my counsel, I 14:26
20 A On the advice and direction of my counsel, I 14:23	20 respectfully decline to answer. And I assert the 14:26
21 respectfully decline to answer. And I assert the 14:23	21 rights guaranteed to me under the Fifth Amendment to 14:26
22 rights guaranteed to me under the Fifth Amendment to 14:23	22 the Constitution of the United States. 14:26
23 the Constitution of the United States. 14:24	23 Q You agree that Uber would not have been able 14:26
24 Q It's correct that you attended a meeting at 14:24	24 to have developed its Li LiDar lens designs 14:26
25 Uber's headquarters in mid-January 2016? 14:24	25 without using the confidential information that you 14:26
Page 154	Page 156
Tage 15.	
1 A On the advice and direction of my counsel, I 14:24	1 took from Google? 14:26
1 A On the advice and direction of my counsel, I 14:24	1 took from Google? 14:26
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:27
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25 17 rights guaranteed to me under the Fifth Amendment to 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:28
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25 17 rights guaranteed to me under the Fifth Amendment to 14:25 18 the Constitution of the United States. 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:27 17 downloaded from Google in 2015; correct? 14:28 18 A On the advice and direction of my counsel, I 14:28
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25 17 rights guaranteed to me under the Fifth Amendment to 14:25 18 the Constitution of the United States. 14:25 19 Q You met with Brian McClendon at Uber in the 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:27 17 downloaded from Google in 2015; correct? 14:28 18 A On the advice and direction of my counsel, I 14:28 19 respectfully decline to answer. And I assert the 14:28
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25 17 rights guaranteed to me under the Fifth Amendment to 14:25 18 the Constitution of the United States. 14:25 19 Q You met with Brian McClendon at Uber in the 14:25 20 summer of 2015; correct? 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:27 17 downloaded from Google in 2015; correct? 14:28 18 A On the advice and direction of my counsel, I 14:28 19 respectfully decline to answer. And I assert the 14:28 20 rights guaranteed to me under the Fifth Amendment to 14:28
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25 17 rights guaranteed to me under the Fifth Amendment to 14:25 18 the Constitution of the United States. 14:25 19 Q You met with Brian McClendon at Uber in the 14:25 20 summer of 2015; correct? 14:25 21 A On the advice and direction of my counsel, I 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:27 17 downloaded from Google in 2015; correct? 14:28 18 A On the advice and direction of my counsel, I 14:28 19 respectfully decline to answer. And I assert the 14:28 20 rights guaranteed to me under the Fifth Amendment to 14:28 21 the Constitution of the United States. 14:28
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25 17 rights guaranteed to me under the Fifth Amendment to 14:25 18 the Constitution of the United States. 14:25 19 Q You met with Brian McClendon at Uber in the 14:25 20 summer of 2015; correct? 14:25 21 A On the advice and direction of my counsel, I 14:25 22 respectfully decline to answer. And I assert the 14:25 23 respectfully decline to answer. And I assert the 14:25 24 respectfully decline to answer. And I assert the 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:27 17 downloaded from Google in 2015; correct? 14:28 18 A On the advice and direction of my counsel, I 14:28 19 respectfully decline to answer. And I assert the 14:28 20 rights guaranteed to me under the Fifth Amendment to 14:28 21 the Constitution of the United States. 14:28 22 Q The number and configuration of LiDar lasers 14:28
1 A On the advice and direction of my counsel, I 14:24 2 respectfully decline to answer. And I assert the 14:24 3 rights guaranteed to me under the Fifth Amendment to 14:24 4 the Constitution of the United States. 14:24 5 Q At this mid-January 2016 meeting, you 14:24 6 discussed Uber potentially acquiring the new venture 14:24 7 you were planning; correct? 14:24 8 A On the advice and direction of my counsel, I 14:24 9 respectfully decline to answer. And I assert the 14:24 10 rights guaranteed to me under the Fifth Amendment to 14:24 11 the Constitution of the United States. 14:24 12 Q And, at this meeting in mid-January 2016, you 14:24 13 discussed the technology that Uber would be able to 14:24 14 acquire if it bought your new venture; correct? 14:24 15 A On the advice and direction of my counsel, I 14:25 16 respectfully decline to answer. And I assert the 14:25 17 rights guaranteed to me under the Fifth Amendment to 14:25 18 the Constitution of the United States. 14:25 19 Q You met with Brian McClendon at Uber in the 14:25 20 summer of 2015; correct? 14:25 21 A On the advice and direction of my counsel, I 14:25 22 respectfully decline to answer. And I assert the 14:25 23 rights guaranteed to me under the Fifth Amendment to 14:25 23 rights guaranteed to me under the Fifth Amendment to 14:25	1 took from Google? 14:26 2 A On the advice and direction of my counsel, I 14:26 3 respectfully decline to answer. And I assert the 14:26 4 rights guaranteed to me under the Fifth Amendment to 14:26 5 the United States Constitution. 14:27 6 Q You agree that, without the use of 14:27 7 information reflected in the 14,000 documents you 14:27 8 downloaded in December 2015, Uber would not have been 14:27 9 able to develop its own LiDar lens design; correct? 14:27 10 A On the advice and direction of my counsel, I 14:27 11 respectfully decline to answer. And I assert the 14:27 12 rights guaranteed to me under the Fifth Amendment to 14:27 13 the Constitution of the United States. 14:27 14 Q Uber's LiDar laser design was designed using 14:27 15 Google's confidential information, including 14:27 16 information contained in the 14,000 documents you 14:27 17 downloaded from Google in 2015; correct? 14:28 18 A On the advice and direction of my counsel, I 14:28 19 respectfully decline to answer. And I assert the 14:28 20 rights guaranteed to me under the Fifth Amendment to 14:28 21 the Constitution of the United States. 14:28 22 Q The number and configuration of LiDar lasers 14:28 23 in Uber's system is derived from Google confidential 14:28

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 42 of 48 ATTORNEYS EYES ONLY

	1
1 A On the advice and direction of my counsel, I 14:28	1 THE WITNESS: Maybe I 14:31
2 respectfully decline to answer. And I assert the 14:28	2 MR. EHRLICH: Yeah, yeah, yeah. 14:31
3 rights guaranteed to me under the Fifth Amendment to 14:28	3 I do think that calls for attorney-client 14:31
4 the Constitution of the United States. 14:28	4 privileged information. I'm going to direct him not 14:31
5 Q The pulse rate of Uber's LiDar lasers is 14:28	5 to answer. 14:31
6 derived from confidential information you took from 14:28	6 MR. PERLSON: Okay. Have you read 14:31
7 Google, including information in the 14,000 files you 14:28	7 Judge Alsup's rules regarding this? 14:32
8 downloaded in 2015; correct? 14:29	8 MR. EHRLICH: Candidly, I have not read. If 14:32
9 A On the advice and direction of my counsel, I 14:29	9 there's a rule directly on point, I have not. 14:32
10 respectfully decline to answer. And I assert the 14:29	10 MR. PERLSON: Well, why don't we take a 14:32
11 rights guaranteed to me under the Fifth Amendment to 14:29	11 break, and you can read the rule. 14:32
12 the Constitution of the United States. 14:29	12 MR. EHRLICH: Okay. We can do that. 14:32
Q Uber's LiDar optical cavity design is derived 14:29	13 THE VIDEOGRAPHER: We are going off the 14:32
14 from confidential information that you took from 14:29	14 record. The time is 2:31. 14:32
15 Google, including 14,000 files you downloaded in 14:29	15 (Recess taken.) 14:32
16 December 2015; correct? 14:29	16 THE VIDEOGRAPHER: We are back on the record. 14:43
A On the advice and direction of my counsel, I 14:29	17 The time is 2:42. 14:43
18 respectfully decline to answer. And I assert the 14:29	18 MR. EHRLICH: So 14:43
19 rights guaranteed to me under the Fifth Amendment to 14:29	19 MR. PERLSON: Go ahead. 14:43
20 the Constitution of the United States. 14:29	20 MR. EHRLICH: So, I've now had a chance to 14:43
Q You agree that the 14:29	21 read the order. I can I do think the question 14:43
14:29	22 calls for attorney-client privileged information, and 14:43
23 used by Uber, is derived from confidential information 14:30	23 I'm going to instruct him not to answer. 14:43
24 that you took from Google, including the 14,000 files 14:30	24 But, as an Officer of the Court, I will 14:43
25 you downloaded in December 2015; correct? 14:30	25 represent there was no discussion between 14:43
Page 158	Page 160
1 A On the advice and direction of my counsel, I 14:30	1 Mr. Levandowski and either Mr. Ramsey or myself about 14:43
2 respectfully decline to answer. And I assert the 14:30	2 the substance of his testimony, period. 14:43
3 rights guaranteed to me under the Fifth Amendment to 14:30	There was, however, very brief discussion 14:43
4 the Constitution of the United States. 14:30	4 between Mr. Levandowski and counsel for Uber, limited 14:43
5 Q Did you discuss the substance of your 14:30	5 to the subject of his employment history, prior to his 14:43
6 testimony at all with counsel during any breaks in 14:30	6 employment at Google. 14:43
7 today's deposition? 14:30	7 MS. RAY: And, to make clear, it had nothing 14:43
8 MR. EHRLICH: I'm going to object on 14:30	8 to do we did not discuss your questioning at all. 14:43
9 attorney-client privilege grounds. 14:30	9 I asked some informational questions 14:44
And, to the extent it's not covered by 14:30	10 MR. EHRLICH: That's correct. 14:44
11 privilege, I'm going to direct you to assert your 14:31	11 MS. RAY: of Mr. Levandowski. 14:44
12 constitutional rights. 14:31	12 MR. EHRLICH: There there was no 14:44
THE WITNESS: On the advice 14:31	13 discussion about answers he gave or questions you had 14:44
MR. EHRLICH: Go ahead. 14:31	14 asked up to that point in the deposition. 14:44
THE WITNESS: and direction of my counsel, 14:31	15 MR. PERLSON: Okay. 14:44
16 I respectfully decline to answer. And I assert the 14:31	16 MR. EHRLICH: And that, other than that very 14:44
17 rights guaranteed to me under the Fifth Amendment to 14:31	17 brief discussion, there's been no further 14:44
18 the Constitution of the United States. 14:31	18 communication at all. 14:44
MR. PERLSON: Well, so are you instruct so 14:31	19 MR. PERLSON: And who was who specifically 14:44
20 I I am just asking a yes-or-no question first. 14:31	20 was involved in that discussion? 14:44
20 I I am just asking a yes-or-no question first. 14:31	
21 Q Did you discuss the substance of your 14:31	21 MR. EHRLICH: The discussion with 14:44
Q Did you discuss the substance of your 14:31	21 MR. EHRLICH: The discussion with 14:44
Q Did you discuss the substance of your 14:31 testimony today with counsel during any breaks in 14:31	21 MR. EHRLICH: The discussion with 14:44 22 Mr. Levandowski and Uber's counsel was with Ms. Ray. 14:44
Q Did you discuss the substance of your 14:31 22 testimony today with counsel during any breaks in 14:31 23 today's deposition? 14:31	21 MR. EHRLICH: The discussion with 14:44 22 Mr. Levandowski and Uber's counsel was with Ms. Ray. 14:44 23 I believe I was listening. Mr. Ramsey may have been 14:44

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 43 of 48 ATTORNEYS EYES ONLY

1 MS. RAY: It was less than a couple of 14:44	1 MR. EHRLICH: Correct. It does include the 14:47
2 minutes, and it was a factual clarification. Not 14:44	2 Fifth Amendment, as well as other as 14:47
3 related to your questioning; related to my 14:44	3 attorney-client privilege. But, primarily, the issue 14:47
4 understanding of something. 14:44	4 at hand is the is the Fifth Amendment privilege as 14:47
5 MR. PERLSON: Okay. 14:44	5 well. 14:47
6 MR. EHRLICH: So, thank you for letting me 14:44	6 MR. PERLSON: And the Fifth Amendment is 14:47
7 clarify the record. 14:44	7 being asserted by Mr. Levandowski as to the document 14:47
8 MR. PERLSON: Okay. 14:44	8 requests as modified by the judge at the hearing on 14:47
9 Q The did you do anything to look for 14:44	9 Wednesday; is that correct? 14:47
10 documents in relation to this deposition, 14:45	10 MR. EHRLICH: Correct. We as we made 14:47
11 Mr. Levandowski? 14:45	11 clear at the hearing, we intend to assert 14:47
MR. EHRLICH: I'm going to instruct you to 14:45	12 Mr. Levandowski's Fifth Amendment privilege broadly as 14:47
13 use this one. Assert your rights. 14:45	13 against any active production that would be covered 14:47
14 THE WITNESS: On the advice and direction of 14:45	14 under the Hubbel [sic] line of cases. 14:47
15 my counsel, I respectfully decline to answer. And I 14:45	15 And so, that is something the the 14:47
	16 standard practice for Fifth Amendment privilege is to 14:48
17 Amendment to the Constitution of the United States. 14:45	17 make an in-camera showing so the judge could evaluate 14:48
18 MR. PERLSON: Q. Do you have documents 14:45	18 whether the privilege is being asserted properly or 14:48
19 responsive to the subpoena document requests that we 14:45	19 not, and we intend to do that. 14:48
20 propounded on you? 14:45	MR. PERLSON: Okay. Well, we don't need to 14:48
21 MR. EHRLICH: I'm going to direct 14:45	21 talk further about that on the record. 14:48
22 Mr. Levandowski to assert his rights. 14:45	22 MR. EHRLICH: Thank you. 14:48
But I can address that, if you would like me 14:45	23 MR. PERLSON: I think that's it 14:48
24 to, on the record. 14:45	24 MR. EHRLICH: Okay. 14:48
25 MR. PERLSON: I would, but I 14:45	25 MR. PERLSON: from us. 14:48
Page 162	Page 164
1 THE WITNESS: Okay. 14:45	1 MS. RAY: I have some questions. May I 14:48
2 MR. PERLSON: Why don't you do this first. 14:45	2 switch seats with you? 14:48
3 THE WITNESS: Yeah. 14:46	3 MR. PERLSON: Sure. 14:48
4 On the advice and direction of my counsel, I 14:46	4 THE VIDEOGRAPHER: Shall we go off the record 14:48
5 respectfully decline to answer. And I assert the 14:46	5 to do this? 14:48
6 rights guaranteed to me under the Eifth Amendment to 14.46	
6 rights guaranteed to me under the Fifth Amendment to 14:46	6 MS. RAY: Sure. 14:48
7 the Constitution of the United States. 14:46	6 MS. RAY: Sure. 14:48 7 THE VIDEOGRAPHER: We are going off the 14:48
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46 19 assert any privileges. And we will certainly comply 14:46	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50 19 MR. PERLSON: Objection; form. 14:51
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46 19 assert any privileges. And we will certainly comply 14:46 20 with that order on Wednesday. 14:47	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50 19 MR. PERLSON: Objection; form. 14:51 20 THE WITNESS: Does that mean I answer or not? 14:51
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46 19 assert any privileges. And we will certainly comply 14:46 20 with that order on Wednesday. 14:47 21 But, as of today, there are no responsive 14:47	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50 19 MR. PERLSON: Objection; form. 14:51 20 THE WITNESS: Does that mean I answer or not? 14:51 21 I'm not clear. 14:51
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46 19 assert any privileges. And we will certainly comply 14:46 20 with that order on Wednesday. 14:47	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50 19 MR. PERLSON: Objection; form. 14:51 20 THE WITNESS: Does that mean I answer or not? 14:51
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46 19 assert any privileges. And we will certainly comply 14:46 20 with that order on Wednesday. 14:47 21 But, as of today, there are no responsive 14:47	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50 19 MR. PERLSON: Objection; form. 14:51 20 THE WITNESS: Does that mean I answer or not? 14:51 21 I'm not clear. 14:51
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46 19 assert any privileges. And we will certainly comply 14:46 20 with that order on Wednesday. 14:47 21 But, as of today, there are no responsive 14:47 22 non-privileged documents that we have located. 14:47	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50 19 MR. PERLSON: Objection; form. 14:51 20 THE WITNESS: Does that mean I answer or not? 14:51 21 I'm not clear. 14:51 22 MR. EHRLICH: If he objects, you still have 14:51
7 the Constitution of the United States. 14:46 8 MR. EHRLICH: And, Counsel, to address that, 14:46 9 we have been searching, racing as fast as possible to 14:46 10 search in every location we can come up with, that may 14:46 11 have responsive documents. 14:46 12 As of this morning, when we appeared for the 14:46 13 deposition, we have not located any responsive 14:46 14 non-privileged documents. We are continuing to 14:46 15 search, of course. 14:46 16 And, as Counsel knows, Judge Alsup has 14:46 17 ordered us to produce in-camera a log identifying any 14:46 18 documents that are responsive at all to which we 14:46 19 assert any privileges. And we will certainly comply 14:46 20 with that order on Wednesday. 14:47 21 But, as of today, there are no responsive 14:47 22 non-privileged documents that we have located. 14:47 23 MR. PERLSON: Okay. And, when you say 14:47	7 THE VIDEOGRAPHER: We are going off the 14:48 8 record. The time is 2:48. 14:48 9 (Recess taken.) 14:48 10 THE VIDEOGRAPHER: We are back on the record. 14:50 11 The time is 2:50. 14:50 12 14:50 13 EXAMINATION 14:50 14 BY MS. RAY: 14:50 15 Q Mr. Levandowski, do you recall that your 14:50 16 counsel stated, during this deposition, that if there 14:50 17 were questions about your background before you joined 14:50 18 Google, you would answer them? 14:50 19 MR. PERLSON: Objection; form. 14:51 20 THE WITNESS: Does that mean I answer or not? 14:51 21 I'm not clear. 14:51 22 MR. EHRLICH: If he objects, you still have 14:51 23 to answer. 14:51

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 44 of 48 ATTORNEYS EYES ONLY

1 THE WITNESS: I I do remember saying that, 14:51	1 and I built a website for seeing the inside locations 14:53
2 yes. 14:51	2 of things. I made a map of campus. 14:53
3 MS. RAY: Q. So, let me ask you some 14:51	3 Q Can you give me an example of a website that 14:53
4 A Or I do remember 14:51	4 you built for seeing the inside of things. 14:53
5 Q Let me ask you some questions about your 14:51	5 A So, the Tamalpais High School website had an 14:53
6 background. 14:51	6 internal version that described this system where 14:53
7 Where were you born? 14:51	7 there was, you know, pictures that you could navigate 14:53
8 A I was born 14:51	8 and click through and see forward or back or around. 14:53
9 MR. EHRLICH: You can answer. 14:51	9 You know, there's other websites that I 14:53
10 THE WITNESS: Okay. 14:51	10 created later on post-high school. Once one was an 14:53
11 I was born in Brussels, Belgium. 14:51	11 internal website for a company called Central Garden 14:53
12 MS. RAY: Q. Where were you raised? 14:51	12 and Pets which allowed the business to share internal 14:53
13 A I was raised in Brussels, Belgium, until I 14:51	13 information about their customers and their products, 14:53
14 was 14, and then I came to the United States. 14:51	14 as well as their employees; similar things that you 14:53
15 Q And, did you come to California then? 14:51	15 call, you know, intranets today. 14:53
16 A I did, yes. 14:51	16 Q Why did you build the website so that you 14:54
17 Q Do you have any children? 14:51	17 could see the inside of the high school? 14:54
18 A I do, yes. 14:51	18 A I received the first digital camera from my 14:54
19 Q What are their ages? 14:51	19 family, and I thought it was interesting to be able to 14:54
20 A I have two. Alex is six, and Miles is three. 14:51	20 take pictures and kind of visit a location remotely. 14:54
21 Q I'd like to ask you some questions about your 14:51	21 I thought that would be interesting to have the 14:54
22 education. 14:51	22 students to be able to show off the school, as well as 14:54
23 Where did you attend high school? 14:51	23 show that off to my friends and my mom, who lived in 14:54
24 A I went to two high schools. First is 14:51	24 Belgium still. 14:54
•	
25 Tamalpais High School in Marin County, and then 14:51 Page 166	25 Q When you were an undergraduate, did you have 14:54 Page 168
1 University High School in San Francisco. 14:52	1 any business ventures? 14:54
2 Q When did you graduate from high school? 14:52	2 A I did, yes. 14:54
3 A In 1998. 14:52	3 Q What was one of your businesses during 14:54
4 Q Did you go to college? 14:52	4 undergrad? 14:54
5 A I did, yes. 14:52	5 A It was called La Raison, and it was the 14:54
6 Q Where did you go to college? 14:52	6 MR. EHRLICH: How do you spell that? 14:54
7 A I went to college at UC Berkeley for 14:52	7 THE WITNESS: L-A, R-A-I-S-O-N. 14:54
8 undergrad and grad school. 14:52	8 MS. RAY: Q. And what was La Raison? 14:54
9 Q When did you graduate from undergrad? 14:52	9 A It was a business that was making websites 14:54
10 A In 2002. 14:52	10 and intranets for other businesses. 14:54
11 Q When did you graduate from graduate school? 14:5	Q When did you get involved with autonomous or 14:55
12 A In 2003. 14:52	12 driverless vehicles? 14:55
13 Q What was your major during undergrad? 14:52	13 A It started in a class where we were learning 14:55
14 A I studied industrial engineering and 14:52	14 Java and robotics with Professor Roger Glassey. And 14:55
15 operations research. 14:52	15 we built self-driving vehicles out of, you know, Lego 14:55
16 Q And what was your master's degree in? 14:52	16 Mindstorms using the Java programming language. 14:55
17 A It was in industrial engineering and 14:52	17 MR. EHRLICH: Did you say Lego? 14:55
18 operations research, as well as management of 14:52	18 THE WITNESS: Lego, L-E-G like the toys 14:55
19 technology. 14:52	19 that my kids play with now. 14:55
20 Q While you were in high school, did you have 14:52	20 MS. RAY: Q. Did this work receive any 14:55
21 any business ventures? 14:52	21 recognition? 14:55
22 A I did, yes. 14:52	22 A Well, after the class, I entered a 14:55
23 Q What were they? 14:52	23 competition which was several universities competing, 14:55
24 A I started selling candy freshman year to the 14:52	24 including, I believe, Stanford and Santa Clara 14:55
25 fellow students there. And then, I built websites, 14:52	25 University, that was organized by the Sun 14:55
Page 167	Page 169

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 45 of 48 ATTORNEYS EYES ONLY

1 Microsystems, and specifically organized by the folks 14:55	1 building the Ghost Rider? 14:58
2 that created the the language of Java. 14:55	2 A I built a substantial portion of it myself, 14:58
3 And it was competing for what they at the 14:55	3 but I also created a team to help me build the tools 14:58
4 time was the Gosling Award, which was named after 14:56	4 and software and hardware to make the system work. 14:58
5 James Gosling, who is the inventor of Java. 14:56	5 Q Was the Ghost Rider ever used on public 14:58
6 And for that, I created a monopoly build 14:56	6 streets? 14:58
7 sorting robots that won the competition. I then 14:56	7 A It was. We did some testing on on public 14:58
8 received the Gosling Award. 14:56	8 roads prior to the event to make sure that it was able 14:58
9 Q Earlier we heard about the DARPA Challenge. 14:56	9 to go up certain hills and stay in in the right 14:58
How did you learn about that challenge? 14:56	10 lanes and so forth. 14:59
11 A My mom knew how much I loved robots and that 14:56	11 Q Where did you do that testing on public 14:59
12 I loved making things. And she gave me a call when 14:56	12 streets? 14:59
13 she found out about this competitions sponsored by the 14:56	13 A We did that in Richmond, California. 14:59
14 defense department. And she thought it was really 14:56	14 Q How many other two-wheeled entrants were in 14:59
15 exciting for me to be able to know that I was going 14:56	15 that same competition? 14:59
16 on. And when I saw it, I couldn't resist, and I 14:56	16 A There were none. It was, frankly, a pretty 14:59
17 decided to enter. 14:56	17 crazy idea to go and make things even harder than 14:59
18 Q Can you tell me a little bit more about what 14:56	18 everybody already believed the challenge to be. 14:59
19 the DARPA race was. 14:56	19 Q Why was it harder to have a two-wheel 14:59
20 A So, the DARPA Grand Challenge was a set of 14:56	20 two-wheel entry? 14:59
21 three competitions. The the first one was 14:56	21 A Well, to get a car to move down the street, 14:59
22 obviously, we didn't know there was going to be a 14:56	22 you know, 20 feet, you can kind of apply a little bit 14:59
23 follow-up system. 14:57	23 of accelerator and not steer, and the vehicle will do 14:59
24 And it was a effectively, it was a race 14:57	24 that. 14:59
25 from LA to Vegas across the desert. It was really 14:57	25 To get a motorcycle to move forward, you have 14:59
Page 170	Page 172
1 Barstow to Vegas, you know, across the desert. And 14:57	1 to build a lot of technology beforehand to make it to 14:59
	1 to build a lot of technology beforehand to make it to 14:59 2 be able to just drive in a straight line. And so, 14:59
1 Barstow to Vegas, you know, across the desert. And 14:57	
Barstow to Vegas, you know, across the desert. And 14:57 the goal was to release a vehicle into the world on 14:57	2 be able to just drive in a straight line. And so, 14:59
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58 17 words. And then we'll you'll turn the switch and 14:58 18 let the vehicle go through and see if it makes it or 14:58 19 not. 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00 17 stabilizing the vehicle. And the the motorcycle 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58 17 words. And then we'll you'll turn the switch and 14:58 18 let the vehicle go through and see if it makes it or 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00 17 stabilizing the vehicle. And the the motorcycle 15:00 18 went out of the gate and fell down. So that was very 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58 17 words. And then we'll you'll turn the switch and 14:58 18 let the vehicle go through and see if it makes it or 14:58 19 not. 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00 17 stabilizing the vehicle. And the the motorcycle 15:00 18 went out of the gate and fell down. So that was very 15:00 19 embarrassing. 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58 17 words. And then we'll you'll turn the switch and 14:58 18 let the vehicle go through and see if it makes it or 14:58 19 not. 14:58 20 Q What was your entry into the DARPA Challenge? 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00 17 stabilizing the vehicle. And the the motorcycle 15:00 18 went out of the gate and fell down. So that was very 15:00 19 embarrassing. 15:00 20 Q What happened to the Ghost Rider after the 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58 17 words. And then we'll you'll turn the switch and 14:58 18 let the vehicle go through and see if it makes it or 14:58 19 not. 14:58 20 Q What was your entry into the DARPA Challenge? 14:58 21 A The entry was called Ghost Rider, and it was 14:58 22 a two-wheeled motorcycle. It was the first of its 14:58 23 kind, to our knowledge, at that time and, you know, 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00 17 stabilizing the vehicle. And the the motorcycle 15:00 18 went out of the gate and fell down. So that was very 15:00 19 embarrassing. 15:00 20 Q What happened to the Ghost Rider after the 15:00 21 race? 15:00 22 A We used it again for the following 15:00 23 competition, which was, I think, a year or so later. 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58 17 words. And then we'll you'll turn the switch and 14:58 18 let the vehicle go through and see if it makes it or 14:58 19 not. 14:58 20 Q What was your entry into the DARPA Challenge? 14:58 21 A The entry was called Ghost Rider, and it was 14:58 22 a two-wheeled motorcycle. It was the first of its 14:58 23 kind, to our knowledge, at that time and, you know, 14:58 24 self-driving motorcycle. 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00 17 stabilizing the vehicle. And the the motorcycle 15:00 18 went out of the gate and fell down. So that was very 15:00 19 embarrassing. 15:00 20 Q What happened to the Ghost Rider after the 15:00 21 race? 15:00 22 A We used it again for the following 15:00 23 competition, which was, I think, a year or so later. 15:00 24 And then after that one, where the performance was 15:00
1 Barstow to Vegas, you know, across the desert. And 14:57 2 the goal was to release a vehicle into the world on 14:57 3 its own without any remote control or assistance in 14:57 4 order to try to get, you know, a piece of equipment 14:57 5 from one location to the next without any supervision 14:57 6 or input. 14:57 7 And, it was kind of a monumental step in 14:57 8 thinking how things were done before, where 14:57 9 previously, the defense department, clearly wanting to 14:57 10 move materials and troops from one point to the other, 14:57 11 had done contract works for specific objectives, and 14:57 12 the progress had been very slow. 14:57 13 And so, this DARPA was attempting to 14:57 14 circumvent that by having a competition that was just 14:57 15 clean, saying, Here is the start. Here is the finish. 14:57 16 We'll give you a road that you can follow, in other 14:58 17 words. And then we'll you'll turn the switch and 14:58 18 let the vehicle go through and see if it makes it or 14:58 19 not. 14:58 20 Q What was your entry into the DARPA Challenge? 14:58 21 A The entry was called Ghost Rider, and it was 14:58 22 a two-wheeled motorcycle. It was the first of its 14:58 23 kind, to our knowledge, at that time and, you know, 14:58	2 be able to just drive in a straight line. And so, 14:59 3 you're just making the problem harder than it needs to 14:59 4 be. 14:59 5 Q How did the Ghost Rider do in the 14:59 6 competition? 14:59 7 A It didn't do as well as I was hoping. It 14:59 8 it turned out that the complexities and challenges of 15:00 9 adding the balancing before you could start testing 15:00 10 all of the other navigation and optical were hard. 15:00 11 But, on the first year, we actually did 15:00 12 manage to qualify. And out of the 109 teams or so 15:00 13 that applied, you know, 14 or so qualified, and we 15:00 14 were one of them. 15:00 15 On the day of the race, I I made a 15:00 16 mistake, and I forgot to turn on the software for 15:00 17 stabilizing the vehicle. And the the motorcycle 15:00 18 went out of the gate and fell down. So that was very 15:00 19 embarrassing. 15:00 20 Q What happened to the Ghost Rider after the 15:00 21 race? 15:00 22 A We used it again for the following 15:00 23 competition, which was, I think, a year or so later. 15:00

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 46 of 48 ATTORNEYS EYES ONLY

1 manually turn around and precisely drive backs to that 15:03		
3 And I donated it to the Smithsonian, where it is 15:01 4 today. 15:01 15:02 Q After graduate school, where did you work? 15:01 6 A After graduate school, where did you work? 15:01 6 A After graduate school, so I - long day, so I 15:01 7 don't have the whole chronology down. 15:01 8 But I did a couple of things, one of which 15:01 9 was I was the - having met all of the teams in a very 15:01 10 monthreatening way by making a robotic motorcycle 15:01 11 through the Grand Challenge, one of the teams was Team 15:01 12 Dad. Dad, are we there yer? And it was by Bruce Hall 15:01 12 Dad. Dad, are wether yer? And it was by Bruce Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustiscs who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 15 stereo camera, and in the second Grand Challenge made 15:02 17 they sell today. 15:02 20 outputted video data, as well as specific outputs, 15:02 20 outputted video data, as well as specific outputs, 15:02 21 outputted video data, as well as specific outputs, 15:02 22 out it. 15:02 15:03 14 at the All the specific work of the Velodyne has been supported video data, as well as specific outputs, 15:02 24 alses rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 24 Q When you say that you were working on the 15:02 25 prototype that evolved into the Velodyne has 15:02 26 pelped them integrate and jist understand what this 15:02 27 A Correct, the LiDar, yes. 15:02 29 A There is a LiDar Gent I, which was about this 15:02 29 A There is a LiDar Gent I, which was about this 15:03 12 of that was, looking at a video screen want enough. 15:03 15 And I remember a couple of times where, in 15:03 15 And I remember a couple of times where, in 15:03 16 gerting that ready for demonstration and sale, I 15:03 15 O day, doy our mean t	1 it was pretty unique and novel and new, and so they 15:00	1 manually turn around and precisely drive back so that 15:03
4 unda abstract out the skill of the operator and turn 15:04 5 Q After graduate school, where did you work? 15:01 7 don't have the whole chronology down 15:01 8 Dat I did a couple of things, one of which 15:01 9 was I was thehaving met all of the teams in a very 15:01 10 nonthreatening way by making a robotic motorcycle 15:01 11 through the Grand Challenge, one of which 15:01 12 Dat. Dad, are we there yet? And it was by Brace Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell toolay. 15:02 18 And, after the race, I helped them get their 15:02 20 outpurted video data, as well as specific outpurs. 15:02 21 site in outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then, I you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 coday, do you mean the LiDar fart Velodyne - 15:02 27 A Correct, the LiDar, yes. 15:02 28 Q When you say that you were working on the 15:02 29 A There is a LiDar Gen I, which was about this 15:02 31 A There is a LiDar Gen I, which was about this 15:02 41 Q When you say that so were working on the 15:03 42 Q When you want to be able to get Ethernet packets. And Dave 15:03 43 You want to be able to get Ethernet packets. And Dave 15:03 44 There what it swill be the were though in 15:05 45 Q When you say that so were working on the 15:02 46 Q When you say that so were working on the 15:02 47 A Correct, the LiDar, yes. 15:05 48 Q when you say that so were working on the 15:02 49 A There is a LiDar Gen I, which was about this 15:02 50 Coday, do you mean the LiDar that Velodyne - 15:03 51 And, for people to undes	2 requested it for an exhibit on autonomous vehicles. 15:01	2 you could plant your seeds in one specific time, and 15:04
5 Q After graduate school, where did you work? 15:01 6 A After graduate school, so 1 – long day, so 1 15:01 7 don't have the whole chromology down. 15:01 8 But I did a couple of things, one of which 15:01 9 was I was the – having met all of the teams in a very 15:01 10 nonthractering way by making a robotic motorcycle 15:01 11 through the Grand Challenge, one of the teams was Team 15:01 12 Dad. Dad, are we there yet? And it was by Bruce Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 20 outputed widoo dam, as well as specific outputs, 15:02 21 into outputing Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 alles rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 helped them integrate and just understand what this 15:02 27 A Correct, the LiDar yee. 15:02 28 Q - Sells - sells today? 15:03 3 Pour sensor cound do for — for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne thay ell 15:02 9 A There is a LiDar Gen I, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what this 15:02 12 In And the propelie to understand what their 15:02 13 For the sells today? 15:03 14 Correct, the LiDar yee. 15:02 15 prototype that evolved into the Velodyne than 15:03 16 getting that ready for demonstration and sale, 1 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 numing. 15:03 19 Q What tese did you do after graduate school 15:03 21 A I had — I took the software for the 6thest 15:03 22 Rife and a couple of times which with the series where in 15:04 23 that you — a farmer could actually go and, you know, up and 15:03 24 rife	3 And I donated it to the Smithsonian, where it is 15:01	3 then harvest them at a very different specific time, 15:04
6 A After graduate school, so I – long day, so I 15:01 7 don't have the whole chronology down. 15:01 8 But I did a couple of things, one of which I 15:01 9 was I was the – having met all of the teams in a very 15:01 10 nonthreatening way by making a robotic motorcycle 15:01 11 through the Grand Challenge, one of the teams was Tsam 15:01 12 Daal. Dad, are we there yet? And it was by Bruce Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made a 15:01 15 stereo camera, and in the second Grand Challenge made a 15:01 15 stereo camera, and in the second Grand Challenge made a 15:01 19 unit from the arth as evolved into the Velodyne that is 15:02 21 me is made and the early, early protopye that just 15:02 22 me it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 today, do you mean the LiDar that Velodyne and 15:02 27 he beged them integrate and just understand what this 15:02 28 Q When you say that you were working on the 15:02 29 A Q when you say that you were working on the 15:02 29 A There is a LiDar Gen I, which was about this 15:02 20 I arge, which is in the Smithsonian as well. 15:03 21 A There was a LiDar on the vehicle that we were 15:05 25 traveled and met many of the teams that were building 15:02 36 Q When you say that you were working on the 15:02 37 A There is a LiDar Gen I, which was about this 15:02 38 Q — selfs - selfs today? 15:02 39 A There is a LiDar Gen I, which was about this 15:03 31 You want to be able to get Ethernet packets. And Dave 15:03 31 You want to be able to get Ethernet packets. And Dave 15:03 31 You want to be able to get Ethernet packets. And Dave 15:03 31 And then 1-took the software for the Ghost 15:03 32 In A land – I took the software for the Ghost 15:03 32 In A land – I took the software for the Ghost 15:03 33 In	4 today. 15:01	4 and abstract out the skill of the operator and turn 15:04
7 A After that, we this is where I worked with 15:04 8 But I did a couple of things, one of which 15:01 9 was I was the having met all of the teams in a very 15:01 10 nonthreatening way by making a robotic motorcycle 15:01 11 through the Grand Challenge, one of the teams was Team 15:01 12 bad, Dad, and we therey very 14 and it was by Brace Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 17 they sell today. 18 And, after the race, I helped them get their 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packes to so that others could 15:02 22 saids rep. And then, I became also the first Velodyne and 15:02 23 And then, I became also the first Velodyne and 15:02 24 sales rep. And then I, pou know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 beighed them integrate and just understand what this 15:02 27 a Correct, the LiDar, yea. 28 Q - sells - sells today? 29 A There is a LiDar Gen I, which was about this 15:02 30 are were working on the 15:02 40 Q When you say that you were working on the 15:02 50 prototype that evolved into the Velodyne they sell 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packes. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 26 arising that was found a catally you and you know, up and 15:03 27 A Clorect, the LiDar, yea. 28 Rider and applied that to self-driving tractors on 15:03 29 A There was a LiDar on the velicity that we were logging laser 15:05 50 paffer you started - after that first day you started 15:05 51 product? 51 THE WITNESS: Okay. 15:05 52 pricatesy straight down the whole fiel	5 Q After graduate school, where did you work? 15:01	5 that into the machine. 15:04
7 A After that, we this is where I worked with 15:04 8 But I did a couple of things, one of which 15:01 9 was I was the having met all of the teams in a very 15:01 10 nonthreatening way by making a robotic motorcycle 15:01 11 through the Grand Challenge, one of the teams was Team 15:01 12 bad, Dad, and we therey very 14 and it was by Brace Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 17 they sell today. 18 And, after the race, I helped them get their 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packes to so that others could 15:02 22 saids rep. And then, I became also the first Velodyne and 15:02 23 And then, I became also the first Velodyne and 15:02 24 sales rep. And then I, pou know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 beighed them integrate and just understand what this 15:02 27 a Correct, the LiDar, yea. 28 Q - sells - sells today? 29 A There is a LiDar Gen I, which was about this 15:02 30 are were working on the 15:02 40 Q When you say that you were working on the 15:02 50 prototype that evolved into the Velodyne they sell 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packes. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 26 arising that was found a catally you and you know, up and 15:03 27 A Clorect, the LiDar, yea. 28 Rider and applied that to self-driving tractors on 15:03 29 A There was a LiDar on the velicity that we were logging laser 15:05 50 paffer you started - after that first day you started 15:05 51 product? 51 THE WITNESS: Okay. 15:05 52 pricatesy straight down the whole fiel	6 A After graduate school, so I long day, so I 15:01	6 Q What did you do next after that project? 15:04
8 Professor Thrun and a couple of his students, and we 15:04 9 was I was the — having met all of the teams in a very 15:01 11 through the Grand Challenge, one of the teams was Team 15:01 12 Daol. Dad, are we there yet? And it was by Bruce Hall 15:01 13 and Dave Hall. the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge, made a 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 20 outputted video data, as well as specific outputs, 15:02 21 was it. 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne and 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 these vehicles and helped them get the Velodyne and 15:02 27 helped them integrate and just understand what this 15:02 28 Q — sells – sells today? 15:02 39 A There is a LiDar Gen I, which was about this 15:02 10 large, which is in the Smithsontian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 Tod want to be able to get Ethernet packets, and Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 munning. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 At I had – I rook the software for the Ghost 15:03 22 Rider and applied that to self-driving mactors on 15:03 23 that you – a farmer could actually go and, you know, 15:03 24 fide along the tractor, and the ready for demonstration and sale, 15:03 25 precisely straight down the whole field, and it could 15:03 26 precisely straight down the whole field, and it could 15:03 27 precisely straight down the w		
9 started a company that was known as — as VueTool. I 15:04 10 nonthreatening way by making a robotic motorcycle 115:01 11 brough the Grand Challenge, one of the teams was Team 15:01 12 Dad. Dad, are we there yet? And it was by Bruce Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 18 And, after the race, I helped them get their 15:02 19 mit from the early, early prototype that just 15:02 20 outputted vided datu, as well as specific outputs. 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne and 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 traveled and met many of the teams that were building 15:02 27 a Peper 17 28 these vehicles and helped them get the Velodyne and 15:02 29 the westor could do for – for their teams. 15:02 30 new sensor could do for – for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:03 5 prototype that evolved into the Velodyne they sell 15:03 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that roady for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 28 Rull was a larged from the velocidance of the processor of the working of the processor of the processor of the velocidance of the velocidance of the vehicle hat were 15:05 15 monthly the processor of the vehicle hat were 15:05 16 today, do you mean the LiDar that Velodyne — 15:02 17 A Correct, the LiDar, yes. 15:02 1		
10 nonthreatening way by making a robotic motorcycle 15:01 11 through the Grand Challenge, one of the teams was Team 15:01 12 Dad. Dad, are we there yet? And it was by fince Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 sales rep. And then I, you know, went around and 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 traveled and met many of the teams that were building 15:02 27 helped them integrate and just understand what this 15:02 28 Q belied them integrate and just understand what this 15:02 29 new sensor could do for - for their teams. 15:02 20 (oday, do) you mean the LiDar that Velodyne - 15:02 21 (oday, do) you mean the LiDar that Velodyne - 15:02 22 (oday, do) you mean the LiDar that Velodyne - 15:02 23 A There was a LiDar on the velice that we were 15:05 24 (oday, do) you mean the LiDar that Velodyne - 15:02 25 (oday, do) you mean the LiDar that Velodyne - 15:02 26 (oday, do) you mean the LiDar that Velodyne - 15:02 37 A Correct, the LiDar, yes. 15:02 38 Q - sells - sells today? 15:02 39 A There is a LiDar Gen I, which was about this 15:02 40 (That was, looking at a video of times where, in 15:03 41 Find laws working on getting that working. 15:03 41 Find laws working on getting that working. 15:03 42 (of that was, looking at a video of times where, in 15:03 43 You want to be able to get Ethernet packets. And Dave 15:03 41 Find laws working on getting that working. 15:03 41 Find laws working on getting that working. 15:03 41 Find laws working on getti		•
11 through the Grand Challenge, one of the teams was Team 15:01 12 Dad. Dad, are we there yet? And it was by Bruce Hall 15:01 13 and Dave Hall, the founders of Velodyne Accountses who. 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then L, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 2 helped them integrate and just understand what this 15:02 2 helped them integrate and just understand what this 15:02 3 new sensor could of for - for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, doy ou mean the LiDar that Velodyne - 15:02 7 A Correct, the LiDar, yes. 15:02 9 A There is a LiDar Gen I, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video steren wash're enough. 15:03 13 You want to be able to get themet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 And well distributed where we working on the 15:03 19 Q What else did you do after graduate school 15:03 21 R I had – I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 hand the early carry the self-driving tractors so 15:03 24 Rider and applied that to self-driving tractors so 15:03 25 procisely straight town the whole field, and it could 15:03 25 precisely straight down the whole field, and i		
12 Dad. Dad, are we there yet? And it was by Bruce Hall 15:01 13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 18 And, after the race, I helped them get their 15:02 19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, pou know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 traveled and met many of the teams that were building 15:02 27 A Correct, the LiDar, yes. 15:02 38 Q — sells – sells today? 15:02 39 A There is a LiDar Gen I, which was about this 15:02 4 Q When you say that you were working on the 15:03 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasnt enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 19 Q What else did you do after graduate school 15:03 20 Rider and applied that to self-driving tractors so 15:03 21 A I had – I look the software for the Gloss 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you – a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 precisely straight down the whole field, and it could 15:03 27 A Decree of the measure of the propose of the self-driving tractors so 15:03 28 you not to give any answers that reference activities 15:05 39 after you started – after that first day you started 15:06 30 A The VerTool product team joined		· · ·
13 and Dave Hall, the founders of Velodyne Acoustics who, 15:01 14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 29 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 belped them integrate and just understand what this 15:02 27 helped them integrate and just understand what this 15:02 28 helped them integrate and just understand what this 15:02 29 part of Velodyne that evolved into the Velodyne they sell 15:02 30 new sensor could do for — for their teams. 15:02 40 Q When you say that you were working on the 15:02 51 prototype that evolved into the Velodyne they sell 15:02 52 prototype that evolved into the Velodyne they sell 15:02 53 A There is a LiDar Gen I, which was about this 15:02 54 A Q When you say that you were working on the 15:03 55 prototype that evolved into the Velodyne they sell 15:03 56 of day, do you mean the LiDar that Velodyne — 15:02 57 A Correct, the LiDar, ges. 15:03 58 you not to give any sunwers that reference activities 15:05 50 after you started — after that first day you started 15:05 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 510 Q What else did you do after graduate school 15:03 511 THE WITNESS: Okay. 15:05 512 A Thar a ready for demonstration and sale, 1 15:03 513 You want to be able to get Ethernet packets. And Dave 15:03 514 Hall was working on getting that ready for demonstration and sale, 1 15:03 515 And I remember a couple of times where, in 15:03 516 getting that ready for demonstration and sale		
14 at the time for the first Grand Challenge, made a 15:01 15 stereo camera, and in the second Grand Challenge made 15:01 16 a 350 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 25 traveled and met many of the teams that were building 15:02 26 thelped them integrate and just understand what this 15:02 27 a New sensor could do for — for their teams. 15:02 28 Q When you say that you were working on the 15:02 29 Q When you say that you were working on the 15:02 30 A There is a LiDar Gen I, which was about this 15:02 41 A There is a LiDar Gen I, which was about this 15:03 41 And I remember a couple of times where, in 15:03 41 And the time after you graduated? 15:03 42 Rider and applied that to self-driving tractors so 15:03 42 Rider and applied that to self-driving tractors so 15:03 43 ride along the tractor, and the tractor would go very 15:03 45 precisely straight down the whole field, and it could 15:03 45 precisely straight down the whole field, and it could 15:03 45 precisely straight down the whole field, and it could 15:03 46 RR. EHRLICH: Okay. 15:06 47 A Carect, the LiDar, yes. 15:03 48 you onto to give any answers that reference activities 15:05 49 A There is a LiDar Gen I, which was about this 15:03 40 G The Wend You want to be able to get Ethernet devices, you know, up and 15:03 40 G What else did you do after graduate school 15:03 40 G What else did you do after graduate school 15:03 40 G What else did you do after graduate school 15:03 40 G What else did you do after graduate school 15:03 40 G What else did you do after graduate school 15:03 40 G What else	,	
15 stereo camera, and in the second Grand Challenge made 15:01 16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 29 outputted video data, as well as specific outputs. 15:02 20 outputted video data, as well as specific outputs. 15:02 21 sinto outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 helped them integrate and just understand what this 15:02 27 helped them integrate and just understand what this 15:02 28 helped them integrate and just understand what this 15:02 39 A Correct, the LiDar, yes. 15:02 40 Q When you say that you were working on the 15:02 51 prototype that evolved into the Velodyne the 15:03 10 And, for people to understand what the value 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking on getting that working. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 Q What else did you do after graduate school 15:03 16 getting that ready for demonstration and sale, 1 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduate? 15:03 21 A That - vice the was a LiDar on the vehicle that we were 15:05 22 Q Did that project involve LiDar? 15:05 23 A There was a LiDar on the vehicle that we were 15:05 24 collecting information on. The generating of the 15:05 25 prototype that evolved into the Velodyne end 15:02 2 Q What ultimately happened with Vuerolor? 15:05 3 a KT - vice VuerTool team and technology ended 15:05 4 up at Google through an acquisition, even though it 15:05 5 wasnit - 15:05 10 argo, which is in the Smithsonian as well. 15:05 11 THE WITNESS: Okay. 15:05 12 M R. HitRLICH: Okay. 15:05		•
16 a 360 laser that has evolved into the Velodyne that 15:02 17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 traveled and met many of the teams that were building 15:02 27 helped them integrate and just understand what this 15:02 28 helped them integrate and just understand what this 15:02 29 helped them integrate and just understand what this 15:02 30 helped them integrate and just understand what this 15:02 31 have sensor could do for – for their teams. 35 prototype that evolved into the Velodyne they sell 15:02 36 today, do you mean the LiDar that Velodyne – 15:02 37 A Correct, the LiDar, yes. 38 Q - sells – sells today? 39 A There is a LiDar Gen I, which was about this 15:02 30 I large, which is in the Smithsonian as well. 35 of that was, tooking at a video screen wasn't enough. 37 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet devices, you know, up and 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You want to be able to get fithernet packets. And Dave 15:03 31 You w		•
17 they sell today. 15:02 18 And, after the race, I helped them get their 15:02 19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 helped them integrate and just understand what this 15:02 27 helped them integrate and just understand what this 15:02 28 Q When you say that you were working on the 15:02 29 A There is a LiDar Gen I, which was about this 15:02 30 A There is a LiDar Gen I, which was about this 15:03 31 And, for people to understand what the value 15:03 31 You want to be able to get Ethernet packets. And Dave 15:03 31 You want to be able to get themether a couple of times where, in 15:03 31 You want to be able to get themether accouple of times where, in 15:03 31 You want to be able to get themether accouple of theme where, in 15:03 32 Rider and applied that to self-driving tractors so 15:03 32 Rider and applied that to self-driving tractors so 15:03 32 Rider and applied that to self-driving tractors so 15:03 33 Rider and splied that to self-driving tractors so 15:03 34 Rider and applied that to self-driving tractors so 15:03 35 Proceively straight down the whole field, and it could 15:03 36 Proceively straight down the whole field, and it could 15:03 37 Proceiver and the did that where we dove did that where we drove around 15:05 38 And then I beader to explore the what the specific area looked like. 15:05 39 A There was a LiDar on the vehicle that we were 15:05 30 A There was a LiDar on the vehicle that we were 15:05 31 Information on. The generating of the 15:05 34 A There was a LiDar on the vehicle that we were 15:05 35 protocype that what the specific area looked like. 15:05 36 A There was a LiDar on the vehicle that we were 15:05 37 A Correct, the LiDar. The Velodyne and 15:02 38		
18 And, after the race, I helped them get their 15:02 19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 traveled and met many of the teams that were building 15:02 27 page 174 11 these vehicles and helped them get the Velodyne and 15:02 28 helped them integrate and just understand what this 15:02 29 Q When you say that you were working on the 15:02 30 new sensor could do for for their teams. 15:02 40 Q When you say that you were working on the 15:02 51 prototype that evolved into the Velodyne they sell 15:02 52 A There is a LiDar Gen I, which was about this 15:02 53 A There was a LiDar on the vehicle that we were 15:05 54 collecting information on. The generating of the 15:05 55 prototype that evolved into the Velodyne they sell 15:02 56 today, do you mean the LiDar that Velodyne 15:02 57 A Correct, the LiDar, yes. 15:02 58 Q sells sells today? 15:02 59 A There is a LiDar Gen I, which was about this 15:02 50 Jarge, which is in the Smithsonian as well. 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 Running. 15:03 51 And I remember a couple of times where, in 15:03 51 Running. 15:03 51 And I remember a couple of times where, in 15:03 51 Running. 15:03 51 And I remember a couple of times where, in 15:03 51 G getting that ready for demonstration and sale, I 15:03 51 G getting that ready for demonstration and sale, I 15:03 51 G getting that ready for demonstration and sale, I 15:03 51 G getting that ready for demonstration and sale, I 15:03 51 G getting that ready for demonstration and sale, I 15:03 51 G getting that ready for demonstration and sale, I 15:03 51 G getting	_	
19 unit from the early, early prototype that just 15:02 20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 helped them integrate and just understand what this 15:02 27 helped them integrate and just understand what this 15:02 28 perceive that evolved into the Velodyne they sell 15:02 39 new sensor could do for for their teams. 15:02 40 Q When you say that you were working on the 15:02 50 prototype that evolved into the Velodyne they sell 15:02 51 prototype that evolved into the Velodyne they sell 15:02 52 Q sells sells today? 15:02 53 A There was a LiDar Gen I, which was about this 15:02 54 Q When you say that you were working on the 15:02 55 prototype that evolved into the Velodyne they sell 15:02 56 today, do you mean the LiDar that Velodyne 15:02 57 A Correct, the LiDar, yes. 15:02 58 Q sells sells today? 15:02 59 A There is a LiDar Gen I, which was about this 15:02 50 drata was, looking at a video screen wasn't enough. 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times where, in 15:03 51 And I remember a couple of times wher		-
20 outputted video data, as well as specific outputs, 15:02 21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 helped them integrate and just understand what this 15:02 27 helped them integrate and just understand what this 15:02 28 helped them integrate and just understand what this 15:02 38 new sensor could do for for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne hey sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 9 A There is a LiDar Gen I, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had – I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you – a farmer could actually go and, you know, 15:03 24 tride along the tractor, and the tractor would go very 15:03 25 traveled and met many of the teams that were building 15:05 26 precisely straight down the whole field, and it could 15:03 27 traveled and met many of the teams that were building 15:05 28 Q sells – sells today? 15:05 29 A There is a LiDar Gen I, which was about this 15:05 30 are und that time after you graduates chool 15:03 31 The WITNESS: Okay. 15:05 31 The WITNESS: Okay. 15:05 31 The WITNESS: The name – Street View		
21 into outputting Ethernet packets so that others could 15:02 22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 helped and met many of the teams that were building 15:02 2 helped them integrate and just understand what this 15:02 2 helped them integrate and just understand what this 15:02 3 new sensor could do for — for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne end 15:02 6 today, do you mean the LiDar that Velodyne — 15:02 9 A There is a LiDar Gen I, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had — I took the software for the Ghost 15:03 22 titute what the specific area looked like. 15:05 24 Collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 25 pictures did not use it, but we were logging laser 15:05 24 Collecting information on. The generating of the 15:05 25 pictures did not use it, but we were logging laser 15:05 24 Collecting information on. The generating of the 15:05 25 pictures did not use it, but we were logging laser 15:05 24 Collecting information on. The generating of the 15:05 25 pictures did not use it, but we were logging laser 15:05 24 Collecting information on. The generating of the 15:05 25 pictures did not use it, but we were logging laser 15:05 26 pictures did not		
22 use it. 15:02 23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 traveled and met many of the teams that were building 15:02 27 helped them integrate and just understand what this 15:02 28 helped them integrate and just understand what this 15:02 30 new sensor could do for — for their teams. 15:02 40 When you say that you were working on the 15:02 51 prototype that evolved into the Velodyne hey sell 15:02 61 today, do you mean the LiDar that Velodyne — 15:02 62 A Correct, the LiDar, yes. 15:02 63 new sensor could do for — for their teams. 15:02 64 Q When you say that you were working on the 15:02 65 prototype that evolved into the Velodyne in 15:02 66 today, do you mean the LiDar that Velodyne — 15:02 77 A Correct, the LiDar, yes. 15:02 80 Q — sells — sells today? 15:02 91 A There is a LiDar Gen I, which was about this 15:03 110 large, which is in the Smithsonian as well. 15:03 121 of that was, looking at a video screen wasn't enough. 15:03 131 You want to be able to get Ethernet packets. And Dave 15:03 141 Hall was working on getting that working. 15:03 152 And I remember a couple of times where, in 15:03 153 Prototype that ready for demonstration and sale, I 15:03 164 getting that ready for demonstration and sale, I 15:03 175 helped him get the Ethernet devices, you know, up and 15:03 187 running. 15:03 198 Q What else did you do after graduate school 15:03 209 around that time after you graduated? 15:03 210 A I had — I took the software for the Ghost 15:03 221 A I had — I took the software for the Ghost 15:03 232 that you — a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 precisely straight down the whole field, and it could 15:03		
23 And then, I became also the first Velodyne 15:02 24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 traveled and met many of the teams that were building 15:02 27 Page 174 1 these vehicles and helped them get the Velodyne and 15:02 28 helped them integrate and just understand what this 15:02 3 new sensor could do for — for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne — 15:02 7 A Correct, the LiDar, yes. 15:02 9 A There is a LiDar Gen I, which was about this 15:03 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A There was a LiDar on the vehicle that we were 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generating of the 15:05 24 collecting information on. The generati	21 into outputting Ethernet packets so that others could 15:02	21 that what the specific area looked like. 15:05
24 sales rep. And then I, you know, went around and 15:02 25 traveled and met many of the teams that were building 15:02 26 helped them get the Velodyne and 15:02 2 helped them integrate and just understand what this 15:02 3 new sensor could do for for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 9 A There is a LiDar Gen I, which was about this 15:03 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 Q What else did you do after graduate school 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 precisely straight down the whole field, and it could 15:03 27 Could the tractor, and the tractor would go very 15:03 28 Q MR. EHRLICH: Okay. 15:05 29 AR. The UETOol product team joined Google, and 15:06 20 The William of the Ethernet devices, you know, up and 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03	22 use it. 15:02	22 Q Did that project involve LiDar? 15:05
25 traveled and met many of the teams that were building 15:02 Page 174 1 these vehicles and helped them get the Velodyne and 15:02 2 helped them integrate and just understand what this 15:02 3 new sensor could do for — for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne — 15:02 7 A Correct, the LiDar, yes. 15:02 9 A There is a LiDar Gen I, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 20 around that time after you graduated? 15:03 21 A I had—I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you — a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 prictures did not use it, but we were logging laser 15:05 Page 1 1 information as well. 15:05 1 information as well. 15:05 1 information as well. 15:05 2 Q What ultimately happened with VueTool? 15:05 4 up at Google through an acquisition, even though it 15:05 5 wasn't — 15:05 6 MR. EHRLICH: Okay. Excuse me, Counsel. 15:05 8 you not to give any answers that reference activities 15:05 10 at Google. 15:05 11 THE WITNESS: Okay. 15:05 12 MR. EHRLICH: Okay. 15:05 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became of your VueTool 15:05 15 product? 15:05 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's — it was about building 15:06 20 MR. EHRLICH: You can give the name, i	23 And then, I became also the first Velodyne 15:02	23 A There was a LiDar on the vehicle that we were 15:05
1 these vehicles and helped them get the Velodyne and 15:02 2 helped them integrate and just understand what this 15:02 3 new sensor could do for — for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar, yes. 15:02 9 A There is a LiDar Gen I, which was about this 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that ready for demonstration and sale, I 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped thim get the Ethernet devices, you know, up and 15:03 18 running. 15:03 20 What else did you do after graduate school 15:03 21 A I had—I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you — a farmer could actually go and, you know, 15:03 25 precisely straight down the whole field, and it could 15:03 25 precisely straight down the whole field, and it could 15:03 26 MR. EHRLICH: You can give the name, if 15:06 27 The Witness: The name — Street View is — 15:06 28 is what the technology and team eventually became. 15:06 29 MR. EHRLICH: Okay. 15:06 20 THE WITNESS: The name — Street View is — 15:06 20 THE WITNESS: The name — Street View is — 15:06 21 MR. EHRLICH: Okay. 15:06 22 THE WITNESS: The name — Street View is — 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06 25 MS. RAY: Q. Did you ever work at a company 15:06	24 sales rep. And then I, you know, went around and 15:02	24 collecting information on. The generating of the 15:05
1 these vehicles and helped them get the Velodyne and 15:02 2 helped them integrate and just understand what this 15:02 3 new sensor could do for for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 8 Q sells sells today? 15:02 9 A There is a LiDar Gen 1, which was about this 15:03 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 20 around that time after you graduated? 15:03 21 A Thad I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 MS. RAY: Q. Did you ever work at a company 15:06 27 MR. EHRLICH: Okay. 15:05 28 Q What ultimately happened with VueTool? 15:05 30 A The the VueTool team and technology ended 15:05 4 up at Google through an acquisition, even though it 15:05 4 up at Google through an acquisition, even though it 15:05 4 up at Google through an acquisition, even though it 15:05 4 up at Google through an acquisition, even though it 15:05 4 up at Google through an acquisition, even though it 15:05 4 up at Google through an acquisition, even though it 15:05 4 up at Google through an acquisition, even though it 15:05 4 up at Google through an acquisition, even though it 15:05 5 wasn't 15:06 4 WR. EHRLICH: Okay. 15:05 10 at Google. 15:05 11 THE WITNESS: Okay. 15:05 1		
2 helped them integrate and just understand what this 15:02 3 new sensor could do for for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 9 A There is a LiDar Gen 1, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 precisely straight down the whole field, and it could 15:03 27 the prototype that evolved into the Velodyne tractors and part of the Ghost 15:03 28 Q What else did you do after graduated? 15:03 29 A There is a LiDar Gen 1, which was about this 15:05 30 A The the VueTool team and technology and team and technology ended 15:05 4 up at Google through an acquisition, even though it 15:05 5 wasn't 15:06 6 MR. EHRLICH: Okay. Excuse me, Counsel. 15:05 7 I'm Mr. Levandowski, I'm going to instruct 15:05 9 after you started after that first day you started 15:05 10 at Google. 15:05 11 THE WITNESS: Okay. 15:05 12 MR. EHRLICH: Okay. 15:05 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became there is something that happened with VueTool? 15:05 16 MR. EHRLICH: Okay Sequence of the Ghost	Page 174	Page 176
2 helped them integrate and just understand what this 15:02 3 new sensor could do for for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 9 A There is a LiDar Gen 1, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 precisely straight down the whole field, and it could 15:03 27 the prototype that evolved into the Velodyne tractors and part of the Ghost 15:03 28 Q What else did you do after graduated? 15:03 29 A There is a LiDar Gen 1, which was about this 15:05 30 A The the VueTool team and technology and team and technology ended 15:05 4 up at Google through an acquisition, even though it 15:05 5 wasn't 15:06 6 MR. EHRLICH: Okay. Excuse me, Counsel. 15:05 7 I'm Mr. Levandowski, I'm going to instruct 15:05 9 after you started after that first day you started 15:05 10 at Google. 15:05 11 THE WITNESS: Okay. 15:05 12 MR. EHRLICH: Okay. 15:05 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became there is something that happened with VueTool? 15:05 16 MR. EHRLICH: Okay Sequence of the Ghost	1 these vehicles and helped them get the Velodyne and 15:02	1 information as well. 15:05
3 new sensor could do for for their teams. 15:02 4 Q When you say that you were working on the 15:02 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 8 Q sells sells today? 15:02 9 A There is a LiDar Gen 1, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduated? 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 precisely straight down the whole field, and it could 15:03 27 prototype that evolved into the Velodyne in 15:02 3 A The the VueTool team and technology ended 15:05 4 up at Google through an acquisition, even though it 15:05 5 wasn't - 15:05 6 MR. EHRLICH: Okay. Excuse me, Counsel. 15:05 8 you not to give any answers that reference activities 15:05 9 after you started after that first day you started 15:05 10 at Google. 15:05 11 THE WITNESS: Okay. 15:05 12 MR. EHRLICH: Okay. 15:05 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became of your VueTool 15:05 15 product? 15:06 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH:		2 Q What ultimately happened with VueTool? 15:05
4 up at Google through an acquisition, even though it 15:05 5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 8 Q sells sells today? 15:02 9 A There is a LiDar Gen 1, which was about this 15:03 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 4 up at Google through an acquisition, even though it 15:05 5 wasn't 15:05 6 MR. EHRLICH: Okay. Excuse me, Counsel. 15:05 7 I'm Mr. Levandowski, I'm going to instruct 15:05 8 you not to give any answers that reference activities 15:05 9 after you started after that first day you started 15:05 10 at Google. 15:05 11 THE WITNESS: Okay. 15:05 12 MR. EHRLICH: Okay. 15:05 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became of your VueTool 15:05 15 product? 15:06 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: Okay. 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR.	3 new sensor could do for for their teams. 15:02	3 A The the VueTool team and technology ended 15:05
5 prototype that evolved into the Velodyne they sell 15:02 6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 8 Q sells sells today? 15:02 9 A There is a LiDar Gen 1, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduated? 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 today, do you mean the LiDar that Velodyne 15:02 4	4 O When you say that you were working on the 15:02	
6 today, do you mean the LiDar that Velodyne 15:02 7 A Correct, the LiDar, yes. 15:02 8 Q sells sells today? 15:02 9 A There is a LiDar Gen 1, which was about this 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 the country of the country of the Ghost 15:03 27 The light of the LiDar, yes. 15:05 28 MR. EHRLICH: Okay. Excuse me, Counsel. 15:05 28 you not to give any answers that reference activities 15:05 29 after you started after that first day you started 15:05 29 after you started after that first day you started 15:05 20 after you started after that first day you started 15:05 21 at Google. 15:05 21 THE WITNESS: Okay. 15:05 22 MR. EHRLICH: Okay. 15:05 23 THE WITNESS: The name Street View is 15:06 24 MR. EHRLICH: Okay. 15:05 25 MS. RAY: Q. Did you ever work at a company 15:06		
7 A Correct, the LiDar, yes. 15:02 8 Q sells sells today? 15:02 9 A There is a LiDar Gen 1, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 25 precisely straight down the whole field, and it could 15:03 26 manual that tractor would go very 15:03 27 manual that tractor would go very 15:03 28 manual that tractor would go very 15:03 29 after you started after that first day you started 15:05 4 gatter you started after that first day you started 15:05 4 gatter you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day you started 15:05 4 after you started after that first day		
8 Q sells sells today? 15:02 9 A There is a LiDar Gen 1, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 25 precisely straight down the whole field, and it could 15:03 26 MS. RAY: Q. Did you ever work at a company 15:06 27 MS. RAY: Q. Did you ever work at a company 15:06		
9 A There is a LiDar Gen 1, which was about this 15:02 10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 25 precisely straight down the whole field, and it could 15:03 26 mich and google. 15:05 27 after you started after that first day you started 15:05 28 after you started after that first day you started 15:05 29 after you started after that first day you started 15:05 20 at Google. 15:05 21 at Google. 15:05 21 THE WITNESS: Okay. 15:05 22 MR. EHRLICH: Okay. 15:05 23 that you a farmer could actually go and, you know, 15:03 24 MR. EHRLICH: Vou can give the name, if 15:06 25 MS. RAY: Q. Did you ever work at a company 15:06	-	<u> </u>
10 large, which is in the Smithsonian as well. 15:03 11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 19 Q What else did you do after graduated? 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 25 precisely straight down the whole field, and it could 15:03 26 The look of that was, looking at a video screen wasn't enough. 15:03 27 And I may be the Ethernet packets. And Dave 15:03 28 And I remember a couple of times where, in 15:03 39 THE WITNESS: Okay. 15:05 30 THE WITNESS: Okay. 15:05 30 THE WITNESS: Okay. 15:05 31 THE WITNESS: Okay. 15:06 31 THE WITNESS: Okay. 15:06 32 The WueTool product team joined Google, and 15:06 33 A The VueTool product team joined Google, and 15:06 34 A The VueTool product team joined Google, and 15:06 35 Then what it became there is something that happened 15:06 36 A The VueTool product team joined Google, and 15:06 37 Then what it became there is something that happened 15:06 38 Afterwards. But it's it was about building 15:06 39 pictures of seeing the world so you can 15:06 30 MR. EHRLICH: You can give the name, if 15:06 31 THE WITNESS: Okay. 15:05 32 THE WITNESS: The name Street View is 15:06 33 is what the technology and team eventually became. 15:06 34 MR. EHRLICH: Okay. 15:06 35 MS. RAY: Q. Did you ever work at a company 15:06	-	
11 And, for people to understand what the value 15:03 12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 11 THE WITNESS: Okay. 15:05 12 MR. EHRLICH: Okay. 15:05 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became of your VueTool 15:05 15 product? 15:06 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 its what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06		•
12 of that was, looking at a video screen wasn't enough. 15:03 13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 12 MR. EHRLICH: Okay. 15:05 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became of your VueTool 15:05 15 product? 15:06 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:05 25 MS. RAY: Q. Did you ever work at a company 15:06		
13 You want to be able to get Ethernet packets. And Dave 15:03 14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 19 Q What else did you do after graduated? 15:03 19 Q What else did you do after graduated? 15:03 20 around that time after you graduated? 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 13 THE WITNESS: Okay. 15:05 14 MS. RAY: Q. What became of your VueTool 15:05 15 product? 15:06 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06		•
14 Hall was working on getting that working. 15:03 15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 14 MS. RAY: Q. What became of your VueTool 15:05 15 product? 15:06 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06 25 MS. RAY: Q. Did you ever work at a company 15:06		•
15 And I remember a couple of times where, in 15:03 16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 19 Q What else did you graduated? 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 15 product? 15:06 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06 25 MS. RAY: Q. Did you ever work at a company 15:06		•
16 getting that ready for demonstration and sale, I 15:03 17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 16 A The VueTool product team joined Google, and 15:06 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06 25 MS. RAY: Q. Did you ever work at a company 15:06		-
17 helped him get the Ethernet devices, you know, up and 15:03 18 running. 15:03 19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 17 then what it became there is something that happened 15:06 18 afterwards. But it's it was about building 15:06 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06	_	•
18 running. 15:03 18 afterwards. But it's it was about building 15:06 19 Q What else did you do after graduate school 15:03 19 pictures of seeing the world so you can 15:06 20 around that time after you graduated? 15:03 20 MR. EHRLICH: You can give the name, if 15:06 21 A I had I took the software for the Ghost 15:03 21 there's any 15:06 22 Rider and applied that to self-driving tractors so 15:03 22 THE WITNESS: The name Street View is 15:06 23 that you a farmer could actually go and, you know, 15:03 23 is what the technology and team eventually became. 15:06 24 ride along the tractor, and the tractor would go very 15:03 24 MR. EHRLICH: Okay. 15:06 25 precisely straight down the whole field, and it could 15:03 25 MS. RAY: Q. Did you ever work at a company 15:06		
19 Q What else did you do after graduate school 15:03 20 around that time after you graduated? 15:03 21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 19 pictures of seeing the world so you can 15:06 20 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06 25 MS. RAY: Q. Did you ever work at a company 15:06		
20 around that time after you graduated? 15:03 20 MR. EHRLICH: You can give the name, if 15:06 21 A I had I took the software for the Ghost 15:03 21 there's any 15:06 22 Rider and applied that to self-driving tractors so 15:03 22 THE WITNESS: The name Street View is 15:06 23 that you a farmer could actually go and, you know, 15:03 23 is what the technology and team eventually became. 15:06 24 ride along the tractor, and the tractor would go very 15:03 24 MR. EHRLICH: You can give the name, if 15:06 21 there's any 15:06 22 THE WITNESS: The name Street View is 15:06 23 is what the technology and team eventually became. 15:06 25 precisely straight down the whole field, and it could 15:03 25 MS. RAY: Q. Did you ever work at a company 15:06		_
21 A I had I took the software for the Ghost 15:03 22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 THE WITNESS: The name Street View is 15:06 27 THE WITNESS: The name Street View is 15:06 28 WR. EHRLICH: Okay. 15:06 29 WR. EHRLICH: Okay. 15:06 20 WR. EHRLICH: Okay. 15:06		
22 Rider and applied that to self-driving tractors so 15:03 23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 THE WITNESS: The name Street View is 15:06 27 THE WITNESS: The name Street View is 15:06 28 is what the technology and team eventually became. 15:06 29 MR. EHRLICH: Okay. 15:06 20 MS. RAY: Q. Did you ever work at a company 15:06	, ,	_
23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03 26 MS. RAY: Q. Did you ever work at a company 15:06		21 there's any 15:06
24 ride along the tractor, and the tractor would go very 15:03 24 MR. EHRLICH: Okay. 15:06 25 precisely straight down the whole field, and it could 15:03 25 MS. RAY: Q. Did you ever work at a company 15:06	22 Pider and applied that to salf driving treaters as 15.02	
25 precisely straight down the whole field, and it could 15:03 25 MS. RAY: Q. Did you ever work at a company 15:06	22 Kidei and applied that to sen-driving tractors so 15:03	THE WITNESS: The name Street View is 15:06
Page 175 Page 1	23 that you a farmer could actually go and, you know, 15:03	23 is what the technology and team eventually became. 15:06
	23 that you a farmer could actually go and, you know, 15:03 24 ride along the tractor, and the tractor would go very 15:03 25 precisely straight down the whole field, and it could 15:03	23 is what the technology and team eventually became. 15:06 24 MR. EHRLICH: Okay. 15:06 25 MS. RAY: Q. Did you ever work at a company 15:06

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 47 of 48 ATTORNEYS EYES ONLY

1 called ENSCO? 15:06	1 represents Uber in this case, she didn't ask you any 15:09
2 A I did, yes. 15:06	2 questions about what you did at Uber; did she? 15:09
3 Q What was ENSCO? 15:06	3 A I 15:09
4 A ENSCO stands for Engineering Science and 15:06	4 MR. EHRLICH: You can answer that. 15:09
5 Computers, and it's a research organization where I 15:06	5 THE WITNESS: Yeah, I she did not ask me 15:09
6 helped build simulators for understanding how 15:06	6 any questions about what I do at Uber. 15:09
7 self-driving vehicles would go and navigate the world. 15:06	7 MR. PERLSON: Q. And Uber is a defendant in 15:09
8 And I helped put proposals on how to 15:06	8 this case? You understand that? 15:09
9 integrate cameras and LiDar for augmenting the 15:06	9 A I do understand that, yeah. 15:09
	-
10 resolution and the depth of specific information. 15:06 11 So, if you had a picture and a set of points 15:07	
	11 Uber's counsel didn't ask you any questions about what 15:09
12 from a laser, you could extract more information by 15:07	12 you did at Uber? 15:09
13 combining the two than just using them separately. 15:07	13 A Well, I did clarify that I was only answering 15:09
14 Q Have we discussed all of your business and 15:07	14 questions about things that I did before I joined 15:09
15 employment ventures before you started at Google at 15:07	15 Google. And I did not join Uber before I joined 15:09
16 this point? 15:07	16 Google. 15:09
A I think so, but I don't know. There may be a 15:07	17 Q And what you did before you joined Google 15:09
18 couple of other ones I don't recall right now. 15:07	18 doesn't have any bearing on whether you stole 15:09
19 Q Thank you. 15:07	19 documents from Google; does it? 15:09
MS. RAY: I don't have any further questions. 15:07	MR. EHRLICH: You can answer, as long as you 15:09
THE WITNESS: Okay. Thank you. 15:07	21 confine your answer to what happened before you joined 15:10
MR. PERLSON: I'm going to have some. Why 15:07	22 Google. 15:10
23 don't you stop. 15:07	23 MS. RAY: Objection; form. 15:10
THE VIDEOGRAPHER: Do you want me to go off? 15:07	24 THE WITNESS: What I what I did before I 15:10
25 MR. PERLSON: Yeah. 15:07 Page 178	25 joined Google does not affect the things that I did 15:10 Page 18
1 THE VIDEOGRAPHER: We are going off the 15:07	1 after I joined Google. 15:10
2 record. The time is 3:07. 15:07	2 MR. PERLSON: And, Ms. Ray talked about 15:10
3 (Recess taken.) 15:07	3 things you had done from an engineering perspective 15:10
4 THE VIDEOGRAPHER: We are back on the record. 15:08	4 before you joined Google. 15:10
5 The time is 3:08. 15:08	5 Q But, if you were such an accomplished 15:10
6 MS. RAY: Before I forget, can we designate 15:08	6 engineer, why did you steal 14,000 documents from 15:10
7 this transcript "Attorneys' Eyes Only"? And then 15:08	7 Google? 15:10
8 we'll go through the process of de-designating. 15:08	8 MS. RAY: Objection; form. 15:10
9 MR. PERLSON: That's acceptable. 15:08	9 THE WITNESS: On the advice of on on 15:10
0 MS. RAY: Great. 15:08	10 the advice and direction of my counsel, I respectfully 15:10
1 MR. EHRLICH: Thank you. 15:08	11 decline to answer. And I assert the rights guaranteed 15:10
2 15:08	12 to me under the Fifth Amendment to the Constitution to 15:10
3 FURTHER EXAMINATION 15:08	13 the United States. 15:10
4 BY MR. PERLSON: 15:08	14 MR. PERLSON: Q. Don't you think that the 15:10
5 Q Mr. Levandowski, you understand that Ms. Ray 15:08	15 jury would be more interested in whether you stole 15:10
16 is Uber's lawyer? 15:08	16 14,000 documents from Google than what you did before 15:11
7 A I do understand that, although I do think 15:08	17 you were at Google? 15:11
	18 MS. RAY: Objection; form. 15:11
8 that MoFo is also representing me. 15:08	
	19 THE WITNESS: On the advice and direction of 15:11
19 Q And 15:08	
19 Q And 15:08 20 MR. EHRLICH: Can I just say, your 15:08	19 THE WITNESS: On the advice and direction of 15:11
19 Q And 15:08 20 MR. EHRLICH: Can I just say, your 15:08 21 understanding is that MoFo represents you. Not in 15:08	19 THE WITNESS: On the advice and direction of 15:11 20 my counsel, I respectfully decline to answer. And I 15:11
19 Q And 15:08 20 MR. EHRLICH: Can I just say, your 15:08 21 understanding is that MoFo represents you. Not in 15:08 22 this matter, however; correct? 15:08	19 THE WITNESS: On the advice and direction of 15:11 20 my counsel, I respectfully decline to answer. And I 15:11 21 assert the rights guaranteed to me under the Fifth 15:11
19 Q And 15:08 20 MR. EHRLICH: Can I just say, your 15:08 21 understanding is that MoFo represents you. Not in 15:08 22 this matter, however; correct? 15:08 23 THE WITNESS: Correct, yes. 15:09	19 THE WITNESS: On the advice and direction of 15:11 20 my counsel, I respectfully decline to answer. And I 15:11 21 assert the rights guaranteed to me under the Fifth 15:11 22 Amendment of the Constitution to the United States. 15:10
19 Q And 15:08 20 MR. EHRLICH: Can I just say, your 15:08 21 understanding is that MoFo represents you. Not in 15:08 22 this matter, however; correct? 15:08 23 THE WITNESS: Correct, yes. 15:09	19 THE WITNESS: On the advice and direction of 15:11 20 my counsel, I respectfully decline to answer. And I 15:11 21 assert the rights guaranteed to me under the Fifth 15:11 22 Amendment of the Constitution to the United States. 15:10 23 MR. PERLSON: Q. Don't you think that the 15:11

Case 3:17-cv-00939-WHA Document 273 Filed 04/25/17 Page 48 of 48 ATTORNEYS EYES ONLY

MITORILETS	ETES ONET
1 anything that Ms. Ray asked you? 15:11 2 MS. RAY: Objection; form. 15:11 3 THE WITNESS: On the advice and direction of 15:11 4 my counsel, I respectfully decline to answer. And I 15:11 5 assert the rights guaranteed to me under the Fifth 15:11 6 Amendment of the Constitution to the United States. 15:10 7 MR. PERLSON: Q. Did the clarification that 15:11 8 Ms. Ray asked of you during this deposition today have 15:11 9 anything to do with the subject matter that was 15:11 10 addressed in her examination of you that just preceded 15:11 11 me? 15:11 12 MS. RAY: Objection. 15:11 13 I instruct him not to answer on 15:12 14 attorney-client privilege grounds. 15:12 15 MR. EHRLICH: And I instruct you to follow 15:12 16 that — that instruction as well. 15:12 17 MS. RAY: Til represent to you, all I did 15:12 18 was ask a factual clarification. 15:12 19 MR. PERLSON: If you — 15:12 20 MS. RAY: But I'm not going to let him talk 15:12 21 to you about privileged matters. 15:12 22 MR. PERLSON: I'll reserve all rights on 15:12 23 that, but we can deal with that later. 15:12 24 That's all. 15:12 25 THE WITNESS: Thank you. 15:12 2 of DVD No. 3 in the deposition of Anthony Levandowski. 15:12 3 We are going off the record. The time is 15:12 4 3:12 p.m. 15:12 5 THE REPORTER: Counsel, did you need a copy? 15:12 6 MR. EHRLICH: I think we will. 15:13 8 for the order? We have a standing order. 15:13 10 immediate delivery today. Are you wanting it the same 15:13 11 time everybody else gets it? 15:13 12 MS. RAY: Yes. 15:13 13 MR. EHRLICH: Sure, sure. That's — we do. 15:13 14 (WHEREUPON, the deposition ended 15:13 15:13 16 —-oOo— 17	1 CERTIFICATE OF REPORTER 2 3 I, ANDREA M. IGNACIO, hereby certify that the 4 witness in the foregoing deposition was by me duly 5 sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause; 6 That said deposition was taken in shorthand 7 by me, a disinterested person, at the time and place 8 therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by 9 computer, under my direction and supervision; 10 That before completion of the deposition, 11 review of the transcript [] was [x] was not requested. If requested, any changes made by the 12 deponent (and provided to the reporter) during the 13 period allowed are appended hereto. 14 I further certify that I am not of counsel or 15 attorney for either or any of the parties to the said 16 deposition, nor in any way interested in the event of this cause, and that I am not related to any of the 17 parties thereto. 18 Dated: April 14, 2017 19 20 21 22 23 24 2ANDREA M. IUNACIO, RPR, CRR, CCRR, CLR, CSR No. 9830 Page 184
19 20	
Page 183	